Ballard Link Extension

Ballard Link Extension Scoping Summary Report

February 2025

Sound Transit

SoundTransit

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Acronyms and Abbreviations

CID	Chinatown-International District
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
FTA	Federal Transit Administration
NEPA	National Environmental Policy Act
SCIDpda	Seattle Chinatown International District Preservation and Development Authority
SEPA	State Environmental Policy Act
WSBLE	West Seattle and Ballard Link Extensions

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Summary

S.1 Purpose

The Federal Transit Administration (FTA) and Sound Transit conducted scoping for the Ballard Link Extension Project (the project) in Seattle, Washington, from October 24 through December 9, 2024, under the National Environmental Policy Act (NEPA). This report describes how FTA and Sound Transit conducted scoping and summarizes the comments received from government entities (agencies and educational institutions), Tribes, businesses, community organizations, and the public during the scoping period.[1] This information will be considered by FTA and Sound Transit as they consider refinements to the project Purpose and Need, identify alternatives to be studied in the Environmental Impact Statement (EIS), and identify environmental resources to study in the EIS.

S.2 The Scoping Process

Scoping for the project was conducted under NEPA in accordance with applicable regulations and guidance. The FTA is the lead federal agency under NEPA.

The NEPA scoping process began with formal notices to prepare an EIS. A Notice of Intent to prepare an EIS was published by FTA in the *Federal Register* on October 24, 2024. Public notification was provided through a variety of methods including multiple listserv emails, ads in local publications, a media advisory, and social media posts.

Two public scoping meetings were held during this period, as well as an online open house from October 24 through December 9, 2024. FTA and Sound Transit asked for comments on the draft Purpose and Need statement; the alternatives that should be evaluated in the EIS; and social, economic, environmental, and transportation issues to evaluate in the EIS. Comments were accepted by mail, email, online comment forms, transcribed phone messages, and through comment forms and via a court reporter at the scoping meetings.

S.3 Government Entity Scoping Comments

FTA and Sound Transit invited 33 agencies to participate during the EIS scoping process. Seven government entities (agencies and educational institutions) submitted scoping comments, which spanned a variety of topics, including the following:

- Alternatives to study in the EIS
- Environmental justice
- Impacts to government facilities and properties
- Impacts to maritime and industrial businesses
- Areas where permitting and agency coordination are needed
- Specific recommendations on potential environmental issues to study in the EIS

[1] For information on the scoping process for the West Seattle and Ballard Link Extensions initiated in 2018, see Section 1.1, Overview.

S.4 Tribal Consultation During Scoping

FTA invited six federally recognized Tribes to participate in the environmental review process and attend scoping meetings via letters sent on October 25, 2024. Sound Transit also invited by letter two non-federally recognized Tribes to participate in the scoping process and attend scoping meetings. No comments were received from any Tribes during the scoping period.

S.5 Businesses and Organizations Scoping Comments

Comments were received from seven businesses and business organizations and ten community organizations, on topics that included the following:

- Preferences for alternatives, primarily in the Chinatown-International District/SODO and Downtown segments
- Potential neighborhood impacts during construction and operations
- Cumulative impacts for multiple construction projects throughout the project corridor
- Environmental justice concerns in Pioneer Square and Chinatown-International District
- Acquisitions/property impacts
- Construction impacts to the Chinatown-International District/SODO and Downtown segments, particularly related to the duration of construction, construction traffic and concurrent closures throughout these segments for multiple stations, and impacts to businesses near construction sites and road closures
- Potential for transit-oriented development at and around stations
- Ease of transfers between Link light rail lines and station accessibility, particularly in the Chinatown-International District and Pioneer Square neighborhoods
- Specific recommendations on potential environmental issues to study in the EIS
- Requests for more specific information on mitigation measures

S.6 General Public Scoping Comments

Approximately 180 people attended the two public scoping meetings, and approximately 9,600 people accessed the online open house during the comment period. Sound Transit received around 140 individual communications (where each communication may contain one or more comments) from the general public in various formats. The major public comment themes that applied to the entire project included the following:

- General support for transit and the project
- Preference for tunnels
- That this is infrastructure that will last for generations and it is critical to build it right
- Shorten the planning/review process – do not delay
- Extend the Draft EIS comment period to 90 days
- Provide efficient multi-modal transportation access at the stations

In the Chinatown-International District/SODO Segment, many comments expressed concern about impacts to the neighborhood from construction (including traffic, noise, and air quality), direct and indirect displacement of residents and businesses, and the need for additional environmental justice/equity analysis. Of commenters that expressed a preference, most favored a station located on 4th Avenue South for the potential opportunity to improve transfers to Sounder commuter rail, King Street Station, and the existing light rail lines and to create an efficient multi-modal hub at the International District/Chinatown Station. A few comments supported the preferred alternative station location to limit potential construction impacts to the Chinatown-International District neighborhood. A few comments supported the 5th Avenue station location, while other comments requested removing the 5th Avenue South alternatives from consideration, citing that they are "culturally infeasible to build." Several comments were received from InScape Arts Building expressing concern about construction next to them of the preferred International District/Chinatown Station.

Most comments on the Downtown Segment were about construction impacts, particularly road closures and construction of multiple stations concurrently, and noise and vibration. Some comments supported the alternative with the Midtown Station closer to Madison Street. A few others were opposed to the location of the Midtown Station for the preferred alternative, because it would displace the Reynolds Reentry Center. Reynolds Reentry Center is the only reentry facility in King County that houses only men as they complete their sentences. The center houses men from all over Washington and provides services such as employment assistance and counseling to transition them into the community when their sentence is complete.

In the South Interbay and Interbay/Ballard segment, most comments were about station location, the Salmon Bay crossing type, and the alignment in Ballard. In the South Interbay Segment, a few comments requested a tunnel under Elliott Avenue West. In the Interbay/Ballard Segment, a few comments supported a tunnel under Salmon Bay and a Ballard Station on 15th Avenue Northwest.

Comments that were not specific to a geography included community outreach, project cost and funding concerns, project schedule, recommendations for alternative technology, and future extensions.

S.7 Next Steps

The comments received during scoping will help inform the Purpose and Need for the project and identify issues to be considered in the Draft EIS. Comments will also help inform the Sound Transit Board's confirmation or modification of a preferred alternative and the other alternatives FTA and Sound Transit will study in the EIS. The EIS will describe the potential benefits and adverse effects of each alternative and will outline potential ways to avoid, minimize, or mitigate adverse effects. FTA and Sound Transit are planning to issue the Draft EIS for the Ballard Link Extension Project for public and agency review in 2025. The Draft EIS will be available for a public comment period that will include public hearings. After the close of the Draft EIS public comment period, the Sound Transit Board will consider public comments as well as the information in the Draft EIS and then confirm or modify the preferred alternative for evaluation in the Final EIS. The Final EIS is planned to be published in 2026. It will respond to comments received on the 2022 West Seattle and Ballard Link Extensions Draft EIS as well as the upcoming Ballard Link Extension Draft EIS and outline mitigation for unavoidable significant impacts. After publication of the Final EIS, the Sound Transit Board will select the project to build. FTA is then expected to prepare a Record of Decision that documents the project that Sound Transit will build and how it will avoid, minimize, and mitigate environmental impacts.

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1 Introduction

1.1 Overview

Sound Transit (the Central Puget Sound Regional Transit Authority) is proposing to expand Link light rail transit service from SODO to Ballard. The Ballard Link Extension Project (the project) is a 7.7-mile long corridor in the city of Seattle in King County, Washington, the most densely populated county of the Puget Sound region. The Ballard Link Extension would include a new 3.3-mile light rail-only tunnel from south of the Chinatown-International District to South Lake Union and Seattle Center/Uptown. Stations would serve the following areas: Chinatown-International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

The project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016 (Sound Transit 2016). Sound Transit and the Federal Transit Administration (FTA) are preparing an Environmental Impact Statement (EIS) as a joint National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) document. FTA is the lead federal agency under NEPA and Sound Transit is the lead agency for SEPA.

A Draft EIS that included the project was published in January 2022. That Draft EIS evaluated both the Ballard Link Extension and West Seattle Link Extension together as one West Seattle and Ballard Link Extensions Project (WSBLE). The extensions were evaluated together in the WSBLE Draft EIS because of their location, schedule, and review efficiencies for partner agencies. SEPA early scoping for the WSBLE project occurred in 2018. FTA published a Notice of Intent in the *Federal Register* on February 12, 2019, initiating the formal scoping process under NEPA for the WSBLE Project which concluded April 2, 2019.

In July 2022, the Sound Transit Board directed that further studies be prepared for the Ballard Link Extension, to evaluate additional station options and other refinements (Motion M2022-57). Some of these project options and refinements required additional conceptual engineering and environmental review. Rather than delay completion of the environmental review process for the West Seattle Link Extension while additional review was conducted for the Ballard Link Extension, Sound Transit and FTA decided to move forward under separate environmental reviews for each extension. The two extensions will operate as separate lines, and the extensions are standalone projects with independent utility. Because the environmental review processes were separated for the two extensions, FTA required preparation of a new Notice of Intent and a new Draft EIS under NEPA. Nonetheless, the new Ballard Link Extension Draft EIS will build on the environmental analysis already completed and include an evaluation of the station options and other refinements requested in 2022 by the Sound Transit Board. Under SEPA, the Ballard Link Extension Draft EIS will be a Supplemental Draft EIS, supplementing the work already completed in the WSBLE Draft EIS. Except where otherwise noted, references to a Draft EIS in this document refers to the new Ballard Link Extension NEPA Draft EIS/SEPA Supplemental Draft EIS.

The project's transit mode and service corridor were identified through the years-long planning process for the Sound Transit Regional Transit Long-Range Plan and Sound Transit 3 Plan (Sound Transit 2014 and 2016). After voter approval for funding the Sound Transit 3 Plan, Sound Transit completed an Alternatives Development process that included three levels of screening to identify alternatives to study in the WSBLE Draft EIS. After each screening analysis was complete, the results were presented to the Stakeholder Advisory Group and an Elected

Leadership Group for feedback. The Stakeholder Advisory Group was composed of consisted of transit riders, residents, key stakeholders, members of the public, and representatives from businesses and major institutional organizations. The Elected Leadership Group included elected officials who represented the project corridor and/or Sound Transit Board. These groups each made recommendations on which alternatives to carry forward to the next screening level. Opportunities for public input were provided between each screening level and feedback was shared with the two groups. This allowed community members to learn more about the alternatives and provide input alongside the Stakeholder Advisory Group and Elected Leadership Group. Following the public scoping period for the WSBLE Draft EIS, the Sound Transit Board reviewed the comments received and the alternatives evaluated in the three-level screening process. In May and October 2019, the Board identified alternatives to study in the WSBLE Draft EIS.

Tribal, public, and agency comments on the WSBLE Draft EIS suggested modifying the alternatives or adding other alternatives. Sound Transit evaluated these modified and other alternatives for the project. In July 2022 the Sound Transit Board directed additional public and stakeholder engagement and preparation of further studies for the Ballard Link Extension. In March and July 2023, following completion of further studies, the Board identified preferred alternatives, refinements to other alternatives, and additional alternatives to study in the Ballard Link Extension EIS.

Table 1-1 lists the alternatives identified to date to be studied in this EIS and the key design changes to alternatives since the WSBLE Draft EIS as applicable. The project is broken into smaller geographic areas called segments and has four segments (Chinatown-International District/SODO, Downtown, South Interbay, and Interbay/Ballard). Figures 1-1 through 1-4 show the alternatives in each segment.

Table 1-1. Ballard Link Extension Alternatives

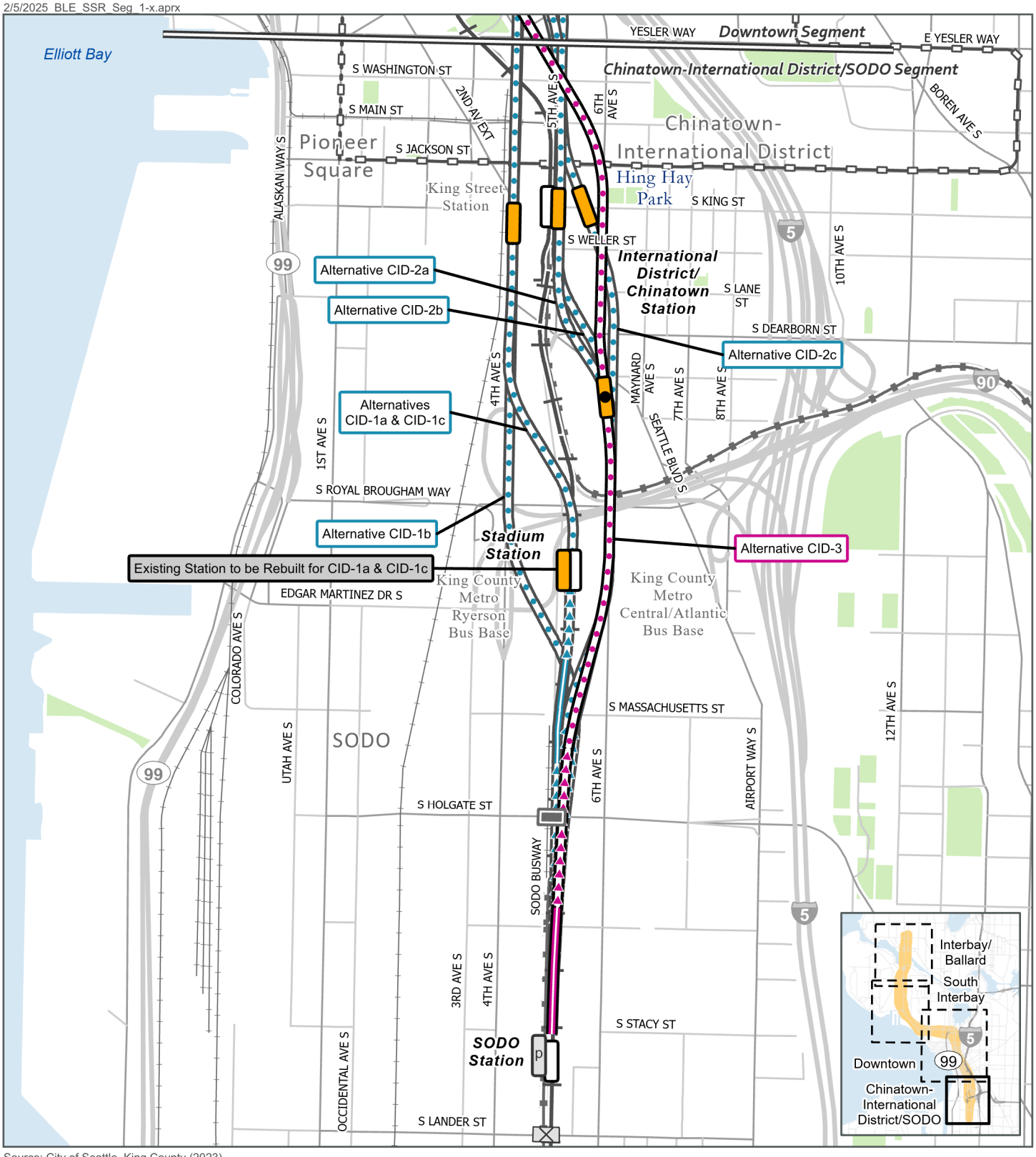
Segment	Alternative	Key Design Changes Since WSBLE Draft EIS
Chinatown-International District (CID)/SODO	Preferred Dearborn Street (CID-3)	New alternative
	4th Avenue Shallow (CID-1a)	None
	4th Avenue Deep (CID-1b)	None
	4th Avenue Shallower (CID-1c)	New alternative
	5th Avenue Shallow (CID-2a)	None
	5th Avenue Deep (CID-2b)	None
	5th Avenue Shallow Diagonal (CID-2c)	None [a]
Downtown (DT)	Preferred 5th Avenue/Harrison Street Refined (Connects to Preferred CID/SODO Alternative) (DT-3a)	New alternative
	5th Avenue/Harrison Street (DT-1)	Denny Station south entrance shifted into 8th Avenue right-of-way
	6th Avenue/Mercer Street (DT-2)	None
	5th Avenue/Harrison Street Refined (Connects to Other CID/SODO Alternatives) (DT-3b)	New alternative
	5th Avenue Consolidated Denny/South Lake Union Station (DT-4)	New alternative

Segment	Alternative	Key Design Changes Since WSBLE Draft EIS
South Interbay (SIB)	Preferred Galer Street Station/Central Interbay (SIB-1)	Minor refinements to curves and guideway columns between tunnel portal and Smith Cove Station; guideway profile change and incorporation of maintenance access road along Interbay Golf Center; relocated special trackwork
	Prospect Street Station/15th Avenue (SIB-2)	None
	Prospect Street Station/Central Interbay (SIB-3)	Guideway profile change and incorporation of maintenance access road along Interbay Golf Center
Interbay/Ballard (IBB)	Preferred Tunnel 15th Avenue (IBB-2b)	Interbay Station shifted south straddling West Dravus Street; guideway and tunnel portal shifted west between Thorndyke Avenue West and the BNSF Railroad; Ballard Station entrances refined to remove southern entrance
	Elevated 14th Avenue (IBB-1a)	None
	Elevated 14th Avenue (from Prospect Street Station/15th Avenue) (IBB-1b)	None
	Tunnel 14th Avenue (IBB-2a)	None
	Elevated 15th Avenue (IBB-3)	Bridge over Salmon Bay designed to have greater maximum clearance over the navigation channel

[a] This alternative was the 5th Avenue Shallow Diagonal Station Configuration in the WSBLE Draft EIS.

1.2 Purpose of Report

FTA and Sound Transit conducted scoping for the new Draft EIS from October 24 through December 9, 2024, under NEPA. This report describes how FTA and Sound Transit conducted scoping and summarizes the comments received from government entities (agencies and educational institutions), Tribes, businesses, community organizations, and the public during the scoping period. This information will be considered by FTA and Sound Transit as they consider refinements to the project Purpose and Need and identify alternatives and environmental resources to study in the EIS.



Source: City of Seattle, King County (2023).

Preferred Alternative
At-Grade · Retained Cut · Tunnel

Other Alternatives
At-Grade · Retained Cut · Tunnel

Station (● *Indicates Preferred Alternative*)
New · Existing · Planned

Segment Line
Existing Link Light Rail
Future Link Light Rail
Railroad
Existing Overpass
Proposed Overpass
Existing Streetcar
Future Culture Connector Streetcar
Park

0 600 1,200 Feet

N

FIGURE 1-1
Segment Alternatives
Chinatown-International District/SODO Segment

Ballard Link Extension

Source: City of Seattle, King County (2023).

Preferred Alternative
- Tunnel

Other Alternatives
- Tunnel

Station (● *Indicates Preferred Alternative*)
- New
- Existing

- Segment Line
- Existing Link Light Rail
- Monorail
- Railroad
- Existing Streetcar
- Future Culture Connector Streetcar
- Park

FIGURE 1-2
Segment Alternatives
Downtown Segment

Ballard Link Extension

0 600 1,200 Feet

N

Source: City of Seattle, King County (2023).

Preferred Alternative
At-Grade Elevated
Tunnel Retained Cut

Other Alternatives
At-Grade Elevated
Tunnel Retained Cut

Station (● *Indicates Preferred Alternative*)
New

Segment Line
Railroad
Park

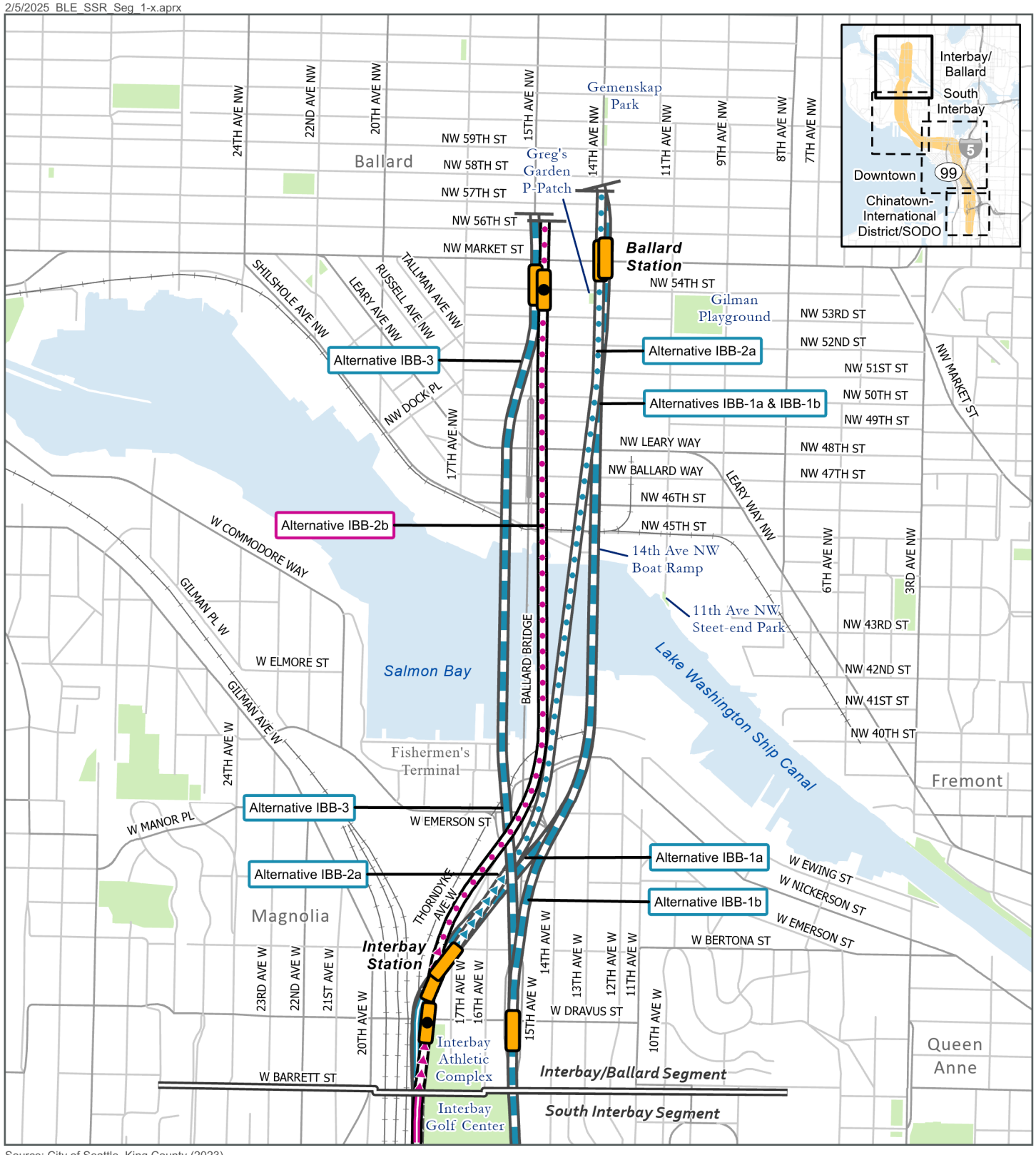
0 600 1,200 Feet

N

FIGURE 1-3
Segment Alternatives
South Interbay Segment

Ballard Link Extension

2/5/2025 BLE_SSR_Seg_1-x.aprx



Source: City of Seattle, King County (2023).

Preferred Alternative
At-Grade
Retained Cut
Tunnel

Other Alternatives
At-Grade
Elevated
Tunnel
Retained Cut

Alternative Terminus

Station (● *Indicates Preferred Alternative*)
New

Segment Line
Railroad
Park

0 600 1,200 Feet

N

FIGURE 1-4
Segment Alternatives
Interbay/Ballard Segment

Ballard Link Extension

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2 The Scoping Process

2.1 Purpose of Scoping

Scoping is an early step in the NEPA process. The purpose of scoping is to inform the public of the proposed project and the Purpose and Need for the project, seek public comment on the range of potential alternatives, and collect feedback from partner agencies, Tribes, and the public on the scope of the environmental issues to study during the EIS process. During scoping, Sound Transit asked for comments from the public, agencies and Tribes on:

What is a Purpose and Need Statement?

A Purpose and Need Statement defines the objectives that project alternatives must meet. FTA and Sound Transit use the Purpose and Need Statement to develop and evaluate project alternatives for analysis during environmental review.

- The draft Purpose and Need statement
- The alternatives that Sound Transit should evaluate in the EIS
- Social, economic, environmental, and transportation issues to evaluate in the EIS

Scoping for the Ballard Link Extension was conducted under NEPA in accordance with applicable regulations and guidance. The FTA is the lead federal agency under NEPA.

2.2 Public Notices in the Federal Register

The scoping process began with formal notices to prepare an EIS. For NEPA, a Notice of Intent to prepare an EIS was published by FTA in the *Federal Register* on October 24, 2024. This notice initiated scoping and started a comment period that extended through December 9, 2024. Copies of the public notices are provided in Appendix A (Public Notices).

2.3 Opportunities for Public, Agencies, and Tribes to Comment

Sound Transit accepted comments by U.S. mail to Ballard Link Extension, c/o Lauren Swift, Sound Transit, 401 South Jackson Street, Seattle, Washington 98104-2826; by email to blescopingcomments@soundtransit.org; through an online comment form at https://ballardlink.participate.online/; by voicemail transcribed at 206-903-7223; verbally transcribed by court reporter at open houses; and in writing. Sound Transit also hosted public scoping meetings on the following dates:

- Thursday, November 7, 2024, in Downtown
- Wednesday, November 13, 2024 in Ballard

An online open house was hosted at https://wsblink.participate.online from Thursday, October 24 through Monday, December 9, 2024.

Meeting advertisement samples are provided in Appendix A, NEPA Scoping Public Involvement Summary. Copies of agency scoping comments are provided in Appendix B, Government Entity Comments; copies of business and business organization comments are provided in Appendix C, Business and Business Organization Comments; and comments submitted by community organizations are provided in Appendix D, Community Organization Comments. Copies of public scoping comments are provided in Appendix E, Public Comments.

2.4 Background Materials

Sound Transit produced the following publications to provide additional information about the Ballard Link Extension Project and how the EIS would be conducted:

- Project folio
- System Expansion folio
- Purpose and Need handout
- Scoping Information handout
- Ballard Link Extension Further Studies Executive Summary
- WSBLE Draft EIS Appendix M, Alternatives Development

Sound Transit posted all publications to the project website (https://wsblink.participate.online/ and https://www.soundtransit.org/system-expansion/west-seattle-ballard-link-extensions) prior to scoping, and they were available at the public scoping meetings. Open house meeting guides were also available at all open house meetings. Information on previous local planning activities, including Sound Transit 3 planning, were also available on Sound Transit's website.

3 Agency Scoping Comments

Table 3-1, Summary of Government Entity Comments, lists the agencies that commented during scoping and summarizes the major themes in their comments. The summaries in this section focus on recommendations or suggestions on alternatives to study in the EIS, other key issues identified, and a list of environmental resource categories with which the agency had concerns. Government entities include federal, state, regional, and local agencies; educational institutions; and agency oversight/advisory boards and commissions. Copies of the comment letters are provided in Appendix D, Government Entity Comments.

Table 3-1. Summary of Government Entity Comments

Agency/ Institution	Major Comment Themes
Federal	
U.S. Environmental Protection Agency (EPA), Region 10	EPA submitted comments expressing support for the project goals and referred to comments submitted for the WSBLE Project in 2019 and 2022. They note the preferred alternative in the area of Salmon Bay is consistent with their previous recommendations and it addresses some of their previous concerns. EPA gave specific suggestions on EIS analysis related to hazardous materials and contaminated sites, aquatic resources, air quality, environmental justice, and climate change. EPA suggested consideration of green infrastructure building opportunities. They also recommended addressing Tribal treaty resources in the EIS and consultation with affected Tribal governments.
State	
Washington State Department of Corrections (Reynolds Reentry Facility)	The Washington State Department of Corrections submitted comments regarding their concern over displacement of the building at 410 4th Avenue South for their Reynolds Reentry Center, which has been located there since 1978. The site serves as a facility for people to transition from prison to the King County community and has served over 10,000 people. They note the amenities their facilities are required to provide and the facility siting process. They also provide information about their recent unsuccessful attempts to site an additional facility in King County.
Regional	
Port of Seattle and Northwest Seaport Alliance	The Port of Seattle and Northwest Seaport Alliance summarized their involvement to date as a cooperating agency and noted comments from the Northwest Seaport Alliance apply only to the SODO area. They requested consideration of regional mobility, including access to Sea-Tac Airport, when considering station locations where transfers between lines would occur. The noted potential direct and cumulative impacts to freight mobility in the SODO and Interbay areas that they would like evaluated.
Puget Sound Regional Council	Puget Sound Regional Council submitted comments affirming the role of the Ballard Link Extension Project in regional planning and their support for high-capacity transit and focused growth in growth centers served by high-capacity transit. They encouraged consideration of door-to-door travel time and ease of access and connections, particularly for those with accessibility and mobility needs. They noted the potential for displacement risk and they requested analysis of this risk and mitigation of this risk. They encourage Sound Transit to continue to find ways to mitigate impacts to local businesses and to further support businesses owned by marginalized communities that may be impacted. They support continuing to analyze transit-oriented development at stations and to look for ways to achieve equitable transit-oriented development.

Agency/ Institution	Major Comment Themes
Local	
City of Seattle	The City of Seattle summarized their involvement to date as a cooperating agency, and affirmed support for the project's purpose and need, alternatives to be studied, and types of impacts to be studied in the EIS. They requested the EIS fully analyze the cumulative impacts during construction of the Ballard Link Extension when considered with other simultaneously planned transportation projects throughout the region.
Educational Institutions	
University of Washington	The University of Washington expressed support for the project and noted the importance of light rail in providing access to their facilities for students and employees. In Downtown, they are concerned with potential impacts to properties in their Downtown Metropolitan tract during operations and construction, including impacts to existing buildings as well as future underground and aboveground development rights. In South Lake Union, they are concerned with potential impacts to buildings that contain vibration- and electromagnetic-field-sensitive equipment and activities, as well as impacts to access during construction. They also expressed interest in transit-oriented development at the station location at 7th Avenue North and Harrison Street.
Advisory Boards/Commissions	
Seattle Design Commission	The Seattle Design Commission submitted comments requesting the following be evaluated for all alternatives in the Chinatown-International District: transit-oriented development and joint development potential; station accessibility, travel times, and safe routes to stations; ability to support expanded use of Union Station; potential for indirect displacement; and impacts on small businesses and the Chinatown-International District community during operations and construction. They requested these trade-offs be clearly depicted for the public in the EIS. They also requested study of access to health care facilities on First Hill from the Midtown and International District/Chinatown stations, joint development and re-development potential for the Seattle Center and Interbay stations, minimizing park impacts at the Interbay Station, activating uses around elevated guideways and stations, and an entrance to the Ballard Station north of Northwest Market Street.

4 Tribal Consultation During Scoping

FTA invited the following federally recognized Tribes to participate in the environmental review process via scoping letters sent on October 25, 2024:

- Confederated Tribes and Bands of the Yakama Nation
- Muckleshoot Indian Tribe
- Snoqualmie Indian Tribe
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Tulalip Tribes of Washington

Sound Transit also invited by letter the Duwamish Tribe and the Snohomish Tribe (non-federally recognized Tribes) to participate in the scoping process.

No comments were received from Tribes during the scoping period.

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5 Public Scoping

5.1 Public Scoping Meetings

Sound Transit held two public scoping meetings to provide an opportunity for the public to learn about the project and to invite comments. Approximately 9,600 people accessed the project website online during the comment period. About 180 people attended the public scoping meetings, held at the following locations:

Meeting #1	**Meeting #2**
Thursday, November 7, 2024	Wednesday, November 13, 2024
5 to 7 p.m.	5 to 7 p.m.
Union Station 401 South Jackson Street Seattle, Washington 98104	National Nordic Museum 2655 Northwest Market Street Seattle, Washington 98107

5.1.1 Meeting Notification

Sound Transit advertised the scoping meetings through a variety of methods, including multiple listserv emails sent to over 12,000 subscribers, ads in local publications (including a blog post engaging over 4,300 subscribers), a media advisory, and social media posts.

Error! Not a valid bookmark self-reference., Media Advertising, summarizes the publications where online and print advertisements were placed and the dates of publication.

Table 5-1. Media Advertising

Publication	Online Run Dates
International Examiner	10/24 to 11/7
NW Asian Weekly	10/24 to 11/7
Seattle Chinese Post	10/24 to 11/7
Seattle Chinese Times	10/24 to 11/7
The Seattle Times	10/24 to 11/7

5.1.2 Public Scoping Meeting Format

Sound Transit asked public scoping meeting attendees to sign in as they arrived. Staff members at the welcome table explained the meeting's purpose and format. Comment forms were translated into Simplified and Traditional Chinese, Vietnamese, and Spanish. Meeting guides were translated into Simplified and Traditional Chinese, Vietnamese, and Spanish for the Union Station open house. Interpreters were available at the Union Station open house for Mandarin, Cantonese, and Vietnamese speakers. Court reporters and American Sign Language interpretation were available at both open houses.

The meetings were conducted as an open house with a short presentation occurring approximately 30 minutes after the meeting began. As part of the open houses, participants were invited to review displays and discuss the project with Sound Transit staff and members of the consultant team. Display boards provided information about Sound Transit, the project

history, the project environmental review process, the project Purpose and Need, opportunities for public involvement, and the project schedule.

Attendees were invited to provide scoping comments at the meeting through various methods:

- Written comment form
- Verbal comment, transcribed by a court reporter
- Typed comment via the online open house

Sound Transit is committed to equal engagement opportunities for all interested members of the public. In addition to Sound Transit community engagement procedures, Executive Order 12898, U.S. Department of Transportation Order 5610.2(a), and FTA Circular C 4703.1 require Sound Transit to provide meaningful opportunities for these groups to engage in the planning process. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin. These directives make environmental justice a part of the decision-making process by identifying and addressing disproportionately high and adverse human health and environmental effects of Sound Transit's programs, policies, and activities on minority and low-income populations.

5.2 Public Outreach to Minority, Low-Income, and Limited-English-Proficient Populations

Sound Transit's community engagement approach through alternatives development and scoping has sought to meet the unique needs of historically underrepresented populations, including low-income, immigrants and refugees, and minorities. Sound Transit conducted a preliminary demographic analysis to identify low-income, minority, and limited-English-proficiency populations. In addition, Sound Transit conducted interviews with 27 social service providers and community organizations corridor-wide prior to scoping for the 2022 WSBLE Draft EIS to better understand populations in the project area, including how minority and low-income populations might relate to the project. Based on this analysis, the Chinatown-International District is the only area along the project corridor with concentrations of minority and low-income individuals above the city average. Sound Transit used the following strategies to engage these populations during alternatives development and scoping:

- Translated key materials (handouts, presentations, display boards, comment forms, and project folios) into languages spoken in the station area, including simplified Chinese, traditional Chinese, Vietnamese, and Spanish
- Publicized events online and in print with ethnic media
- Provided Cantonese, Mandarin, and Vietnamese interpretation support at the scoping meeting held at Union Station, and at other events and community gatherings during the scoping period
- Provided translated text on the online open house web pages, as well as the embedded Google Translate tool
- Held smaller meetings focused on individual communities or organizations
- Attended community organization meetings as requested
- Met communities where they gather, including fairs and festivals, community events, and meetings

5.3 Summary of Public Comments

5.3.1 General Project

Sound Transit received around 140 individual communications (where each communication may contain one or more comments) from the general public in various formats.

Major comment themes that applied to the entire project included the following:

- General support for transit and the project.
- Preference for tunnels.
- That this is infrastructure that will last for generations and it is critical to build it right.
- Shorten the planning/review process – don't delay.
- Extend the Draft EIS comment period to 90 days.
- Provide efficient multi-modal transportation access at the stations.

Copies of these communications are available in Appendix E, Public Comments.

5.3.2 Chinatown-International District/SODO Segment

Table 5-2, Summary of Public Comments Related to Chinatown-International District/SODO Segment, summarizes public comments received on the Chinatown-International District/SODO Segment.

Table 5-2. Summary of Public Comments Related to Chinatown-International District/SODO Segment

Theme of Comment	Comments/Suggestions
International District/Chinatown Station	Some comments expressed preference for the station to be located on 4th Avenue South, primarily to improve transfers to Sounder commuter rail, King Street Station, and the existing light rail line, to create an efficient multi-modal hub at the International District/Chinatown Station. Many of these comments further expressed the importance of locating the station such that transfers between the existing and new light rail lines are as efficient as possible and do not require passengers to come up to street level to transfer. (A few commenters erroneously referred to the station shown at 4th Avenue South and Jackson Street as part of the Sound Transit 3 initiative, indicating that the shown location was key in passing the initiative.) Some comments expressed preference for the station to be located along either 4th Avenue South or 5th Avenue South to allow for more efficient transfers between Sounder commuter rail, King Street Station, and existing Sound Transit light rail lines. A few comments supported the preferred alternative, while some comments specifically opposed the preferred alternative, with many noting concerns about walking distance/time from the Chinatown-International District neighborhood and accessibility. A few comments supported a station on 5th Avenue, while some comments requested that all 5th Avenue South alternatives be removed from consideration, citing that they are "culturally infeasible to build." Some comments requested a social and economic impacts study of station alternatives for the Chinatown-International District Station, and some comments included a request to "study physical, social, equity impacts to 1200+ elderly, physically challenged, non-English speaking residents for each of the alternatives" proposed for the Chinatown-International District. One comment mentioned the need to include independent consultant's reports on North of Chinatown-International District, South of Chinatown-International District, and original Midtown stations to compare them with the 4th Avenue Risk Study. [a]

Theme of Comment	Comments/Suggestions
InScape Arts Building	Over 20 tenants of the InScape Arts Building submitted comments with concerns about construction of the preferred International District/Chinatown Station adjacent to their building, including the following: • Air quality, dust, noise, and vibration during construction impacting usability of space in which to teach and produce art due to the historic property features (e.g., single-pane windows without screens) and therefore loss of workspace, jobs, and economic development • Impacts to access to the parking lot (in which parking for tenants and their clients is needed) • Impacts to the property as a historic and archaeological resource Some of these comments were also concerned with impacts after construction, including the potential for increased property values and property taxes, increases in rent and indirect displacement, and neighborhood impacts related to transit-oriented development. Mitigation was requested for both potential impacts during construction and operations. Some comments suggested that the building be purchased by Friends of InScape to preserve it long-term for arts and culture.

[a] The referenced 4th Avenue Risk Study is assumed to be the presentations to the Sound Transit Board System Expansion Committee on November 14, 2024 (Peters 2024; Sound Transit 2024).

5.3.3 Downtown Segment

Table 5-3, Summary of Public Comments Related to Downtown Segment, summarizes comments received on the Downtown Segment.

Table 5-3. Summary of Public Comments Related to Downtown Segment

Theme of Comment	Comments/Suggestions
Alignment	A few comments requested studying not building a second tunnel and having the line from Ballard connect at Westlake Station.
Midtown Station	A few comments opposed the preferred alternative (specifically the Midtown Station location) as it would require demolition of 410 Fourth Avenue, which has been home to the Washington State Department of Correction's reentry program for decades. A few comments supported the Midtown Station location proposed in the Sound Transit 3 Plan (represented by Alternative DT-1).
South Lake Union Station	A few comments concerned maintaining pedestrian access to the 408 Aurora Avenue North apartment building during construction of this station at 7th Avenue North and Harrison Street. Other comments questioned the proposed location, citing that none of the alternatives are located within their definition of the South Lake Union neighborhood.
Seattle Center Station	One comment suggested changing the station name to something like "Uptown/Lower Queen Anne", so as not to be confused with the monorail's Seattle Center Station. One comment requested the station be as close to Climate Pledge Arena as possible.

5.3.4 South Interbay and Interbay/Ballard Segments

Table 5-4, Summary of Public Comments Related to South Interbay and Interbay/Ballard Segments, summarizes comments received on the South Interbay and Interbay/Ballard segments. The segments are discussed together because most comments referred to them collectively.

Table 5-4. Summary of Public Comments Related to South Interbay and Interbay/Ballard Segments

Theme of Comment		Comments/Suggestions
Alignment	South Interbay	One comment expressed support for the preferred Galer Street/Central Interbay alignment, as it is closest to the cruise ship terminals. A few comments requested a tunnel, instead of the proposed elevated track, along Elliot Avenue West. The main reason is noise resulting from construction and operations within a residential area.
	Interbay/Ballard	There was one comment in support of the tunnel alignment on 14th Avenue Northwest and one comment opposed to it. One comment requested an east-west line between Ballard and the University of Washington.
Stations	Interbay	One comment requested that pedestrian access to/from Magnolia be assessed, as the current sidewalk conditions along West Dravus Street might not be sufficient.
	Ballard	A few comments expressed general support of a station at 15th Avenue Northwest. One comment noted that the 15th Avenue Northwest and Northwest Market Street station would have an impact on the "catchment area". It was suggested that a shallow pedestrian tunnel from the station to 20th Avenue Northwest would alleviate that and expand ridership to the denser part of Ballard to the west. One comment suggested a "2nd station by the Ballard Library" and a few suggested the station be between 20th Avenue Northwest and 22nd Avenue Northwest.
Salmon Bay Crossing		A few comments stated support of a tunnel under Salmon Bay instead of a bridge. One comment suggested building a combined car and light rail tunnel under Salmon Bay.
Future extension		One comment suggested a possible station near Northwest 85th Street and Aurora Avenue North, as part of an elevated alignment along Aurora Avenue, before joining the 2 and 3 lines at Northgate and terminating there, leaving the potential for expansion to Lake City and Bothell. Another comment suggested a Sounder Station at Northwest 85th Street or farther north, and then extending the light rail to serve that station.

5.3.5 Environmental Concerns

Table 5-5, Summary of Environmental Concerns, summarizes comments provided on environmental concerns.

Table 5-5. Summary of Public Comments on Environmental Concerns

Theme of Comment	Comments/Suggestions
Air Quality and Climate Change	Many comments expressed concern about potential air quality impacts, particularly dust emissions and debris caused by construction. Many commenters were also concerned about the location of exhaust vents and potential air quality impacts during operation especially for children and the elderly in the Chinatown-International District. One comment mentioned structures should be designed for 100-year service with minimal and predetermined maintenance to limit carbon footprint and environmental impact.

Theme of Comment	Comments/Suggestions
Construction Impacts	Many comments expressed concern about construction impacts, particularly to residences and businesses. Major concerns were related to noise, air quality, lighting, transportation (autos, bicycles, transit, parking), pedestrian safety and access to businesses. The majority of construction impact concerns were raised about the Chinatown-International District neighborhood. One comment was received about construction impacts Downtown.
Economics	Some comments expressed concern about the potential economic impact of light rail operations on businesses and residents, as follows: • Of the comments received about economic impacts, most expressed concern about potential economic impacts to businesses in the Chinatown-International District. • Of the comments received about economic impacts, most raised concern about the potential for displacements. • Of the comments received about economic impacts, most raised concern about the potential for increases to rents.
Environmental Justice	Many comments expressed concern about potential cultural, economic, environmental, social, and neighborhood impacts to minority and low-income communities and businesses in the Chinatown-International District. Some comments expressed desire to conduct a social and economic impact study of the station alternatives in the Chinatown-International District. In addition, the missed opportunity to improve transit access and reach underserved populations in the Chinatown-International District by locating the station south of the Chinatown-International District was also mentioned.
Historic Properties/Archaelogical Resources	Some comments expressed concern about potential impacts to historic properties and archaeological resources, mostly regarding the former U.S. immigration and detention center, which contains unprotected artifacts of Seattle immigration history, including the tar graffiti written by detainees on in the exercise yards.
Neighborhoods	Some comments were received about potential neighborhood impacts to the Chinatown-International District. Comments generally focused on station location impacting the neighborhood as well as the walkability and construction and operations causing noise and air quality impacts. Concerns were also raised about displacements of businesses and residents. A few comments were concerned about impacts to schools, cultural centers, and community facilities, and requested more study of community programs. Concerns about adverse impacts to the safety of neighborhoods and increased crime and homelessness were also raised. Comments were also received about the safety of alignment and station location, specifically in relation to children and elderly being able to easily access the station and network.
Noise and Vibration	Many comments referenced potential for noise and vibration impacts in residential areas during construction and operations. The majority of noise impact concerns were about the InScape Arts Building as well as the greater Chinatown-International District. A few comments were received about noise impacts to residences along the Queen Anne hillside.
Property Acquisition/Property Values/Indirect Displacement	Some comments were received expressing concern about property acquisition, with most of them concerned about potential acquisition in Ballard and the Chinatown-International District. Some comments were concerned about potential displacements as well as the preferred alternative International District/Chinatown station increasing the property value of the InScape Arts Building, with the costs being passed on to the tenants. Concerns were also raised over acquisition of affordable housing and the loss of housing during a housing shortage.
Public Services	A few comments expressed concerns about impacts on the Washington State Department of Corrections Reynolds Reentry Center.

Theme of Comment		Comments/Suggestions
Transportation	Traffic	A few comments expressed concern about the traffic impacts to already congested roadways, particularly in the Chinatown-International District and 15th Avenue Northwest in Ballard. A few comments also expressed concerns about the impacts of rerouted/disrupted transit on local businesses and elderly transit users.
	Multi-modal Connections	Many comments expressed concerns that the preferred International District/Chinatown station is missing an opportunity to create a multi-modal regional transit hub. Many comments suggested that the project should facilitate efficient multi-modal connections/transfers at stations and expressed the importance of efficient transfers between the light rail lines, Amtrak, and other transit modes. A few comments also expressed an important consideration for station location was ease of access and proximity to cruise ships.
	Pedestrian	Some comments expressed concerns about long transfers for pedestrians in the Chinatown-International District. A comment requested a study of all the options and their impacts on the walkability of the Chinatown-International District neighborhood. A few comments expressed concerns about the location of the South Lake Union Station and how it would impact pedestrian access and experience.
	Ridership	Some comments expressed concerns about transfers between light rail stations for the preferred alternative in the Chinatown-International District and how they would impact ridership. A comment also wondered whether the ridership modeling had been updated to account for the decline in office employment.
	Station access/ADA Access and Mobility	Some comments were received emphasizing the importance of easy access to stations and a convenient and easily navigated pedestrian connection among King Street Station, the current Chinatown-International District station, and the new Link platforms. One comment mentioned the need for an Americans with Disability Act accessibility study to compare station alternatives.
	Transit	Some comments expressed concerns about transit reroutes and impacts during construction. A few comments noted the importance of not having to come to the surface to transfer between light rail lines. A comment expressed disappointment about the Ballard Link Extension schedule delays and mentioned public transit was really important to the whole community.
	Travel Times	A few comments were received requesting that light rail service travel times be quick and efficient and expressed concerns about the preferred alternative International District/Chinatown Station location impacts on travel times and reliability. Comments also recommended multi-modal connections be efficient so as to minimize overall commute travel times and increase ridership potential. A few comments requested information on how travel time impacts during, and after construction.
	Safety	A few comments were received expressing concerns about safety, particularly in relation to potential conflicts between cars and pedestrians/bikes near the Chinatown-International District station. A few comments raised concerns about safety around the station and in the neighborhood.
Visual Impacts		A few comments were received about the potential for visual impacts, primarily in Ballard. The concerns were in relation to elevated guideways impacting the visual character of the neighborhood.

5.3.6 Environmental Concerns

Table 5-6, Summary of Other Public Comments, summarizes other comments that do not fall into the categories discussed in Tables 5-2 through 5-5.

Table 5-6. Summary of Other Public Comments

Theme of Comment	Comments/Suggestions
Community Outreach	Many comments requested Sound Transit increase the Draft EIS comment period to 90 days to increase the level of public engagement/decision making. One comment also requested that Sound Transit plan for informing non-English speakers throughout the region when the Draft EIS is released and about how the alternatives could affect their travel.
Cumulative Considerations and Impacts	A few comments noted the general fatigue with construction disruption and displacements in CID and asked that cumulative construction impacts and environmental justice be evaluated.
Design	One comment asked whether there would be a requirement for corrosion control plan to achieve 100-year service life design. One comment requested center platforms for Downtown tunnel stations. One comment requested study of a deep bore tunnel Downtown to minimize surface impacts during construction.
Future Extension	Some comments expressed the need to consider future extension when designing the project and choosing the preferred alignment, including the ability to develop future transit hubs, connectivity and increased capacity.
Operations/Schedule	Some comments expressed the need to have reliable and frequent operations. A few comments suggested that alternative technology, especially automated options that could allow higher frequency and smaller stations, be used. One comment asked about operating just to Interbay if the portion between Interbay and Ballard needed to be delayed.
Project Cost and Funding	Some comments expressed concerns the Sound Transit Board of Directors was sacrificing long-term network connectivity for short-term cost savings and mentioned reliability and efficiency should be prioritized even if more expensive. A few comments mentioned that the Ballard Link Extension makes more social and economic sense to push forward now compared to West Seattle Link Extension and funds should be allocated to the Ballard Link Extension.
Project Schedule	Some comments expressed the need to complete the project as soon as possible and expressed concerns about further delays.
Public Art/Passenger Experience	One comment requested to include artwork from the artists impacted by the project in the new construction as public art acquisition or activation.
Purpose and Needs	A few comments mentioned the impact on work from home on ridership and overcrowding. In addition, a comment mentioned the project purpose and need should emphasize the need for easy connectivity between lines and among modes and that the user experience should be paramount in the project design.
Station Location and Amenities	One comment asked whether there would be opportunities for conversation or a process around a community benefits agreement to reimagine the South Dearborn Street area with equitable transit-oriented development, public restrooms, lighting and greenspace.
Support Project	Some comments expressed their support to the project.
Urban Design and Transit-oriented Development	Some comments mentioned community-oriented transit development could harm the historic Chinatown-International District community while a few others wondered about the opportunities for community-oriented developments.

5.4 Businesses and Business Organizations

Table 5-7, Summary of Business and Business Organization Comments, summarizes the comments submitted on behalf of community organizations during scoping. Copies of these submittals are available in Appendix C, Business and Business Organization Comments.

Table 5-7. Summary of Business and Business Organization Comments

Business/Business Organization	Comments
Downtown Seattle Stakeholders (includes Amazon, Clise Properties, Commute Seattle, Inspire Washington, Seattle Center Foundation, Seattle Kraken, SODO BIA, Starbucks, University of Washington, and Jane Lewis, a Downtown resident)	Downtown Seattle Stakeholders, a coalition led by the Seattle Metropolitan Chamber of Commerce and the Downtown Seattle Association, submitted comments in support of the project but expressed concern about the level and duration of concurrent construction needed in Downtown for six stations and a tunnel, especially when combined with other projects that will be under construction at the same time. They noted that Downtown Seattle is the region's hub for jobs, arts, sports, and tourism, and is a significant source of tax revenue for multiple levels of government. They requested the Draft EIS disclose all new and additional information available about the preferred alternative and include more detail on impacts and mitigation measures. They consider impacts from 10 or more years of construction to be permanent impacts rather than temporary, and a wide range of resources will be affected during this time. They requested more detailed analysis of economic impacts to Downtown during construction, how surplus property will be disposed of and opportunities for joint development, noise and vibration impacts and mitigation, utility relocation impacts, changes in access to social and health services, a community impacts assessment for the Chinatown-International District, and information on disruption to existing light rail service during construction. They requested that traffic analysis consider return to work policies planned for 2025, other measures of effectiveness than level of service, identification of staging and haul routes, both event and non-event conditions, impacts to transit service, and impacts to on- and off-street parking and wayfinding. They provided specific suggestions for construction analysis at each station, including specific projects that should be considered for cumulative impacts. They suggested leasing property for staging rather than acquiring property so that the owner can redevelop it more quickly after construction ends. They requested the Draft EIS include strategies to avoid, minimize, or mitigate impacts that can be incorporated into standards and requirements for contractors. They referenced successful mitigation used for other large projects in recent years, including for Climate Pledge Arena, projects along the waterfront and the Alaskan Way Viaduct Replacement project, and the Convention Center expansion.
Essex Queen Anne LLC	Essex Queen Anne LLC submitted comments noting their support for the preferred alternative, particularly the Seattle Center station, which would no longer be adjacent to their building. They requested that statements about preserving housing and businesses be added to the project purpose and need and to only study alternatives that would not locate the Seattle Center station directly next to the Seattle Center. They requested more detailed construction analysis and that the design used for the Draft EIS be further advanced compared to the design used for the WSBLE Draft EIS. They also requested greater study of economic impacts, construction impacts, land use impacts, and clarity about whether the Draft EIS is a project-level or programmatic-level document under the SEPA.

Business/Business Organization	Comments
International Community Health Services (ICHS)	International Community Health Services submitted comments supporting the project and requesting consideration of "the following three broad areas in their environmental analysis of the [Ballard Link Extension] BLE project: 1. Use the positive aspects of 4th Avenue S[outh] station location to inform the analysis of potential alternatives, regardless of the final selection; 2. Do not consider 5th Avenue S[outh] as a station option; and 3. More study of connectivity opportunities between Dearborn St[reet] station and the existing CID station." They noted widespread support for a station on 4th Avenue South by the Chinatown-International District and Pioneer Square neighborhoods, and that community concerns regarding the 5th Avenue Diagonal Alternative still remain. They noted the impact that COVID-19 and anti-Asian violence have had and continue to have on the community, and urged Sound Transit not to move forward with the 5th Avenue alternatives or use it as a baseline for cost comparison. They expressed concerns about the preferred location for the International District/Chinatown Station, including accessibility and connectivity. They suggested an underground pedestrian tunnel between this proposed station and the existing station, and requested that Sound Transit study ways to improve connectivity between the stations. They recommended that Sound Transit develop a comprehensive plan for how it and other agencies will make permitting decisions and incorporate community involvement in that process. They also requested noise and vibration analysis for all alternatives being studied in the Chinatown-International District. They requested an extended comment period on the Draft EIS to allow for sufficient time for review of the new preferred alternative.
Keller Supply Company	Keller Supply Company submitted comments opposing the preferred alternative for the Interbay Station, which would displace them. Their location includes a warehouse, outdoor storage, and their corporate national headquarters. They encourage Sound Transit to select another alternative that would not displace them, due to the difficulty they would have relocating in the area due to their space requirement and need for large semi-trucks to access their site.
Nordstrom	Nordstrom submitted comments in support of the project but expressing concern regarding the impacts of construction road closures near their two stores for construction of the Westlake Station under Alternatives DT-1 and DT-2. They noted that these closures would make economic recovery of the Downtown Seattle core more difficult because they would make it more difficult for people to get to and around this area. They are concerned about having to potentially close their stores if sales decline during construction, and also having to relocate their corporate campus either temporarily or permanently.
SODO Business Improvement Area	The SODO Business Improvement Area submitted comments regarding the following: • Impacts to all modes of transportation and general transportation circulation during construction, and the potential for cumulative impacts during construction of multiple projects in SODO as well as the effect of recent zoning changes. • They requested to be involved in interagency coordination regarding impacts to the SODO neighborhood. • Multi-modal connections to the SODO Station between 1st Avenue South and Airport Way South. • Pedestrian access and safety at the Stadium and International District/Chinatown stations. They requested more detail about station access and stated all bus and pick-up/drop-off facilities should be outside of public right-of-way. • Effects of transfers between stations on West Seattle Link Extension stations and other stations, and enhancement of stations to accommodate transfers. • Hide-and-ride parking impacts near stations. • They requested that the closure of the SODO Busway be identified as an impact to SODO district businesses and King County Metro.

Business/Business Organization	Comments
Vulcan	Vulcan submitted comments expressing support for the project but concern about simultaneous construction of multiple stations in the project corridor and noted questions about construction plans and impacts in the South Lake Union neighborhood, particularly around the Denny Station. They requested more analysis of utility relocation needs and impacts, construction logistics, direct and indirect impacts to properties, construction truck traffic, economic impacts to businesses during and after construction, and more detail on mitigation.

5.5 Community Organizations

Table 5-8, Summary of Community Organization Comments, summarizes the comments submitted on behalf of community organizations during scoping. Copies of these letters are available in Appendix D, Community Organization Comments.

Table 5-8. Summary of Community Organization Comments

Community Organization	Comments
Alliance for Pioneer Square	The Alliance for Pioneer Square requested that Pioneer Square be included in the study area, that the entire district be identified as a service area, and that the EIS study impacts to Pioneer Square for all resources. Detailed comments and suggestions were provided regarding the transportation, parking, construction, social, and environmental justice impact analyses and mitigation. They noted the neighborhood has a number of workers that come from South King County and they would like the differences in access to the neighborhood from the south identified as well as differences in access to/from Sea-Tac Airport. They noted the high percentage of minority, low-income, and homeless populations in this neighborhood and the need to maintain access to the services in this area that support them. They requested that design concepts resulting from the South Downtown Hub planning work they have participated in be reflected in the design and alternatives studied in the EIS. They also requested the EIS evaluate the ability of each alternative to help realize the goals of the plan. They also commented on the need for design of the project in the Pioneer Square area being consistent with the scale and character of the neighborhood. They also noted that as part of a settlement agreement with the Washington State Department of Transportation, King County, and the City of Seattle for the Alaskan Way Promenade and Overlook Walk, these agencies agreed to reduce lanes on Alaskan Way South within 15 months of the opening of the Alaska Junction Station for the West Seattle Link Extension. They requested to be a consulting party in the Section 106 process and to be involved in design development in their historic district. They also requested a minimum 90-day comment period on the Draft EIS as well as translated materials and resources for language access be provided at the beginning of the comment period.
GREAT for All Coalition	The GREAT for All Coalition submitted comments supporting the preferred alternative for the International District/Chinatown and Midtown stations. They requested study of traffic and pedestrian impacts, air quality, noise, relocations, neighborhood impacts, small business impacts during construction. They also requested consideration of green space, shade, and water features in the project design.

Community Organization	Comments
InterIm CDA	InterIm CDA submitted comments supporting the preferred alternative for the International District/Chinatown and Midtown stations, and stated that study of the 5th Avenue Diagonal alternative in the Chinatown-International District/SODO Segment should be discontinued. They provided a number of considerations regarding the neighborhood, including limiting disruption to residents' and business's day-to-day lives, preservation of the community's identity, minimizing and mitigating long-term impacts, and ability to divert stadium traffic away from the neighborhood. They expressed concern about noise and air pollution, the ability of the community to enjoy outdoor spaces and walk in the neighborhood during construction, changes in existing transit service, indirect displacement of small businesses, and diversion of traffic into the neighborhood. They also noted the potential for the neighborhood to grow with the preferred alternative station location, including opportunities for low-income housing, green space, small businesses, and community land ownership.
Historic Seattle	Historic Seattle submitted comments stating they feel the preferred alternative in the Chinatown-International District and Downtown will still have adverse effects on cultural and historic resources. They do not support the 5th Avenue Diagonal alternative or the International District/Chinatown and Midtown station locations associated with the preferred alternative. They expressed concerns about impacts from the preferred alternative to the historic INS building and its artist community from construction of the International District/Chinatown station and the demolition of the King County Administration Building for the Midtown Station. They continue to support the 4th Avenue Shallow or the 4th Avenue Shallower alternatives as they feel these would be less impactful to the community.
Historic South Downtown	Historic South Downtown submitted comments noting they agree with the project purpose and need and support equitable access to Pioneer Square and Chinatown-International District. They requested the Draft EIS reflect board input on the feasibility of Chinatown-International District alternatives studied in the WSBLE Draft EIS. They noted that if Alternative CID-2a is considered infeasible, it should not be used as a baseline for comparing costs. They asked that additional studies completed for Alternative CID-1a be reflected in the Draft EIS, and to clarify the Seattle Department of Transportation's position on whether the 4th Avenue South viaduct needs to be replaced. They requested consideration of the West Seattle Link Extension and other projects in cumulative construction impacts, and also the cumulative impacts of the project along with the King County Civic Campus plan on the neighborhoods around the preferred Midtown Station. They requested analysis of zoning changes needed for equitable transit-oriented development for the preferred International District/Chinatown Station. They expressed concern about air quality and noise impacts from haul routes, impacts to the InScape Arts Building, indirect displacement, public safety, and quality of life and health impacts. They also requested study of the effects of stadium events during both construction and operations. They noted the Section 106 Area of Potential Effect will need to be updated. They requested that design concepts resulting from the South Downtown Hub planning work be reflected in the EIS, and noted the need for pedestrian improvements around the preferred International District/Chinatown and Midtown station locations would be greater than for other alternatives. They suggested the Urban Design Framework used at the Capitol Hill Station be a model for managing community input for and mitigating station and transit-oriented development impacts. They also requested a minimum 90-day comment period on the Draft EIS as well as translated materials and resources for language access be provided at the beginning of the comment period.

Community Organization	Comments
Puget Sound Sage	Puget Sound Sage submitted comments requesting more study of both construction and operational impacts to the Chinatown-International District, including noise and vibration, air quality, business displacements, economic impacts, environmental justice, and cumulative impacts. They requested more information on transportation modes used by this community and who would be using the station in this neighborhood, more information on impacts to pedestrian facilities and construction vehicle volumes. They expressed concern regarding the closure of South King Street during construction with the 5th Avenue Diagonal alternative, and that it would result in fewer people visiting the Chinatown-International District. They requested more analysis of cumulative construction projects occurring in the neighborhood, and information on how much additional construction time would be needed for transit-oriented development projects associated with the stations for the preferred alternative or 5th Avenue alternatives. They would like analysis of how changes in transit service with the project would affect transit-dependent residents of the neighborhood. They requested a more thorough comparison of transit-oriented development between alternatives, including information on land available for transit-oriented development after construction, the number of affordable housing units that could be built, opportunities for joint development, and potential for new park or recreational resources.
Seattle Center Foundation and KEXP, Seattle Repertory Theatre, The Vera Project, Cornish College of the Arts, Classical KING FM 98.1, MoPOP, Seattle Children's Theatre, PNW Ballet, and Seattle Opera	The Seattle Center Foundation and multiple resident organizations submitted comments noting appreciation for shifting the preferred location of Seattle Center to the west and requesting analysis of construction transportation direct and cumulative impacts, for both event and non-event times. Specific concerns were road closures, parking, and haul routes. They requested analysis of noise and vibration impacts to facilities on their campus both during construction and operation, impacts from utility relocations, and economic impacts from construction activities in the surrounding neighborhood. They noted concern about cumulative impacts from multiple construction projects occurring at the same time.
Seattle Chinatown International District Preservation and Development Authority (SCIDpda)	SCIDpda submitted comments noting the preferred alternative in the Chinatown-International District/SODO Segment was a response to concerns raised by the community during the WSBLE Draft EIS process, and requesting that Sound Transit continue to center and elevate community voices as well as provide access to new decision makers and executives. They noted findings of a community survey conducted in the summer of 2024 that identified four important concepts related to light rail expansion, including the following: • "CID and Pioneer Square residents are deeply invested long-term partners committed to the vitality, connectedness and accessibility of our neighborhoods. • Residents appear to be willing to shoulder some inconvenience and short-term disruption of construction to reap the benefits of a well-connected transit system that best serves the neighborhood. • When given a choice between the preferred alternative and the 4th Avenue/Midtown alternative, residents prefer 4th Avenue by an exceedingly wide margin. • Residents and workers acknowledge that the preferred alternative will bring the possibility of development opportunities and activity to an un-activated part of the city." They requested that these concepts be integrated into the preferred alternative, and to plan for substantial, innovative, and early mitigation.
South Lake Union Community Council	The South Lake Union Community Council submitted comments in support of the comments submitted by the Downtown Seattle Association (as part of the "Downtown Stakeholders"). They also asked that transit-oriented development be considered early in the planning process for the South Lake Union Station, particularly low-income and workforce housing. They noted they have advocated for this at the site of the preferred alternative South Lake Union Station since 2010.

Community Organization	Comments
Uptown Alliance	The Uptown Alliance submitted comments supporting the project but noting they felt that previous information in the WSBLE Draft EIS and outreach provided was not detailed enough. They requested analysis for the following topics in the Draft EIS: transportation impacts during construction, including during Seattle Center events and concurrent construction for the Seattle Center and South Lake Union stations, economics impacts to small businesses, noise and vibration, disposition of surplus properties and transit-oriented development opportunities, impacts to adjacent property owners, pedestrian improvements needed around stations, how excavated soil would be transported out of the neighborhood, the impacts from this hauling, and how the hillside at the tunnel portal would be stabilized. They requested more detail regarding property acquisition and expressed concern about impacts to the Mediterranean Inn and SIFF Cinema Uptown. They requested coordination with design of the Elliott West Wet Weather Station and illustrations of the projects together. They requested more thorough outreach to the Uptown neighborhood regarding the extent of the project and construction in their neighborhood. They also requested that information be shared in a more detailed a more legible way, such as 3-D visualizations.

6 Next Steps

6.1 Identifying the Ballard Link Extension Draft EIS Alternatives and the Scope of the EIS

The public and agency comments received during scoping will help FTA and Sound Transit finalize the Purpose and Need for the project and identify the issues and alternatives to be considered in the EIS. Following scoping, the Sound Transit Board may identify other alternatives or modifications to be studied in the EIS.

6.2 Ballard Link Extension Draft EIS

As detailed in Section 1, Introduction, this Draft EIS will build on the environmental analysis already completed for the project as part of the WSBLE Draft EIS. This new Ballard Link Extension Draft EIS will describe the potential benefits and adverse effects of each alternative and will outline potential ways to avoid, minimize, or mitigate negative effects. FTA and Sound Transit are planning to issue the Draft EIS for public and agency review in 2025. The EIS will be available for a public comment period that will include public hearings. After the close of the Draft EIS public comment period, the Sound Transit Board will consider public comments as well as the information in the Draft EIS and then confirm or modify the preferred alternative to be evaluated in the Final EIS along with other alternatives.

6.3 Ballard Link Extension Final EIS

The Final EIS will respond to comments received on the Ballard Link Extension Draft EIS, as well as comments received on the WSBLE Draft EIS relevant to the Ballard Link Extension. The Final EIS will also outline potential mitigation commitments for environmental impacts. Work on the Final EIS is expected to begin in 2025 with publication scheduled in 2026.

6.4 Record of Decision

After the publication and review of the Final EIS, the Sound Transit Board will select the project to build. FTA will then issue a Record of Decision. The Record of Decision will document the project that Sound Transit will build and how it will avoid, minimize, and mitigate environmental impacts.

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7 References

Peters, David A. 2024. "Ballard Link Extension CID Station Alternatives." Presentation by Independent Consultant to the Sound Transit Board of Directors. November 14. https://www.soundtransit.org/st_sharepoint/download/sites/PRDA/FinalRecords/2024/Presentation%20-%20BLE%20CID%20Independent%20Consultant%20Report%2011-14-24.pdf.

Sound Transit. 2014. *Regional Transit Long-Range Plan*. https://www.soundtransit.org/sites/default/files/documents/2015123_lrpupdate.pdf. Adopted December 18.

Sound Transit. 2016. *Sound Transit 3, The Regional Transit System Plan for Central Puget Sound*. http://soundtransit3.org/document-library. Adopted June 2016.

Sound Transit. 2024. "Ballard Link Extension CID Additional Study Results and South Downtown Hub Progress." Presentation to Sound Transit Board System Expansion Committee. November 14. https://www.soundtransit.org/st_sharepoint/download/sites/PRDA/FinalRecords/2024/Presentation%20-%20BLE%20CID%20Additional%20Studies%2011-14-24.pdf.

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Appendix B

Government Entity Comments

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December 5, 2024

Erin Littauer, Environmental Protection Specialist
Federal Transit Administration
915 Second Ave., Suite 3192
Seattle, Washington 98174

Lauren Swift, Central Corridor Environmental Manager
Sound Transit
401 Jackson Street
Seattle, Washington 98104

Dear Erin Littauer and Lauren Swift:

Thank you for the Federal Transit Administration's October 24, 2024 letter inviting the U.S. Environmental Protection Agency to engage in the National Environmental Policy Act environmental review process as a participating agency for the Ballard Link Extension Project (BLE) (EPA Project Number 24-0061-FTA) located in the City of Seattle, King County, Washington. The EPA accepts FTA's invitation to participate as a participating agency. Furthermore, the EPA has reviewed FTA's October 24, 2024 Notice of Intent to prepare an environmental impact statement for the BLE Project. The EPA has conducted its review pursuant to the NEPA and our review authority under section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA and requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The proposed BLE Project would extend existing light rail service along a 7.7-mile corridor through downtown Seattle, from SODO to Ballard, and include a new 3.3-mile light rail-only tunnel from south of the Chinatown-International District to South Lake Union and Seattle Center/Uptown. The BLE Project was previously included in the West Seattle and Ballard Link Extensions Project and Draft EIS in 2022. Since then, Sound Transit and FTA decided to conduct separate environmental reviews for each extension, as they will operate as separate lines with independent utility. Because the environmental review processes are now separate, Sound Transit is preparing a State Environmental Policy Act Supplemental Draft EIS for BLE. This scoping comment period is intended to collect feedback on the Purpose and Need, alternatives, and potential topics to be studied in the BLE DEIS.

The EPA is supportive of the Project's goals to improve regional mobility, including expanding service to transit-dependent residents and low-income populations. The EPA also supports goals to provide

regional transit while minimizing adverse impacts on the environment through sustainable practices. The EPA provided scoping comments in April 2019 and DEIS comments in April 2022 for the combined West Seattle and Ballard Link Extensions Project and recommends the FTA and Sound Transit consider EPA's previous comments for the BLE DEIS, as appropriate. The EPA offers the enclosed additional scoping comments on several other and related topics that are important to consider in the DEIS for this project.

Please note that our status as a participating agency has no effect on our authorities under Section 102(2)(c) of the NEPA or Section 309 of the Clean Air Act. Our role as a participating agency does not imply that the EPA will necessarily concur with all aspects of the NEPA documentation. Contingent on agency resources, the EPA agrees to provide preliminary agency feedback on areas in which we have expertise. We will provide early engagement in the NEPA process, participate in coordination meetings, and conduct timely reviews of documents provided for our agency's input during the environmental review process. We particularly appreciate involvement opportunities during transportation planning stages, as well as during development stages of the NEPA document. These early stages provide opportunities to identify important resource issues and to achieve maximum avoidance of environmental impacts.

Thank you for the opportunity to be a participating agency and provide scoping comments for this project. We look forward to working with you during development of the project. If you have questions about this review, or to discuss the EPA participation, please contact Ariana Monroy of my staff at 206-553-2120 or at monroy.ariana@epa.gov, or me, at 206-553-2117 or at sturges.susan@epa.gov.

Sincerely,

SUSAN STURGES

Digitally signed by SUSAN STURGES
Date: 2024.12.05 12:44:27 -08'00'

Susan Sturges, Acting Manager
NEPA Branch

Enclosure

U.S. EPA Detailed Comments on the
Ballard Link Extension Scoping Notice
King County, Washington
December 2024

Alternatives

The NOI identifies build alternatives in the project corridor; all alternatives propose a tunnel from SODO to South Lake Union before transitioning to elevated or retained cut configurations through Interbay. From the Interbay station, alternatives transition to cross Salmon Bay in a tunnel, a high-level fixed bridge, or a movable bridge. Station options in Ballard include elevated and tunnel stations. The project information website identifies a Preferred Alternative that includes a tunnel through Salmon Bay.[1] This Preferred Alternative is in alignment with the EPA's previous recommendations made in 2022.[2] We appreciate that this Preferred Alternative addresses some of the EPA's previous concerns, such as potential impacts to maritime cargo transportation (that could impact critical services to rural and Alaska Native village communities), maritime business displacements, reduction of residential displacements, in-water effects (including aquatic resources), and channel navigation impacts.

Hazardous Materials and Contaminated Sites

As described in our 2019 scoping letter, Salmon Bay hosts a patchwork of sediment contamination to consider and characterize for any in-water and/or shoreline construction activities. We recommend the DEIS identify potential impacts associated with the alternatives, including to hydrology, water quality, sediments, and biota. Identify sediment remediation activities to isolate contamination in-situ and construction best management practices to reduce potential for contamination of surface water, ground water, and sediments.

Aquatic Resources

As described in our 2019 scoping letter, we recommend the DEIS describe and address all potentially affected aquatic resources under the identified alternatives, including surface water and ground water quality and quantity, hydrology, and sensitive aquatic areas. Evaluate impacts in terms of the aerial (acreage) or linear extent to be impacted and by the functions they perform. Address stormwater runoff (including pollutant transport), including use of Low Impact Development strategies, effects to waters listed as impaired under Clean Water Act § 303(d), and compliance with other Clean Water Act requirements and implementing regulations, such as those for Total Maximum Daily Loads, CWA § 404 permits, and anti-degradation.

CWA § 404

CWA § 404 requires permits from the U.S. Army Corps of Engineers (Corps) for the discharge of dredged or fill material into Waters of the United States (WOTUS). Compliance with the CWA § 404(b)(1) Guidelines[3] must be demonstrated before proposed discharges of dredged or fill material may be authorized by the Corps. To authorize the discharge of dredged or fill material into WOTUS, the

[1] https://ballardlink.participate.online/#alternatives. Accessed 11/26/2024.
[2] EPA NEPA comment letter dated April 28, 2022 on FTA and Sound Transit's January 2022 DEIS for the West Seattle and Ballard Link Extensions (CEQ Number 20220008).
[3] 40 C.F.R. § 230.

Corps must make written factual determinations of the potential short-term or long-term effects of a proposed discharge on the physical, chemical, and biological components of the aquatic environment. Because the Corps' authorization will also require a NEPA analysis, the EPA recommends close coordination with the Corps to ensure this NEPA analysis aligns with their permitting process and requirements. The EPA provides below an overview of two important requirements, identification of the Least Environmental Damaging and Practicable Alternative (LEDPA) and mitigation sequencing.

LEDPA

The Guidelines require that no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge, that meets the project purpose, which has less adverse impacts on the aquatic ecosystem.[4] The Corps is, therefore, only able to issue a permit for the LEDPA.[5] Identification of the LEDPA is achieved by performing an alternatives analysis that evaluates the direct, secondary or indirect, and cumulative impacts to jurisdictional WOTUS resulting from each alternative considered. An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of the overall project purposes.[6]

Mitigation Sequence

Demonstrating compliance with the Guidelines necessitates identifying and implementing appropriate steps to avoid, minimize, and compensate for any remaining unavoidable impacts to WOTUS.[7] These steps form a mandatory mitigation sequence that must be followed in order, and no step may be substituted for another. Appropriate and practicable steps used to avoid, minimize, and then compensate for any unavoidable impacts to WOTUS must be outlined prior to issuance of a CWA Section 404 permit, in accordance with both the Guidelines and the 1990 Memorandum of Agreement regarding Mitigation between the EPA and the Department of Army.[8]

The Guidelines require that compensation be provided if it is practicable to provide.[9] Multiple factors cause the EPA to presumptively consider compensation as practicable. Depending upon the WOTUS impact that needs compensatory mitigation, the project location may be within the service areas of an approved mitigation bank or an in-lieu fee program. Permittee-responsible compensation is another option to offset unavoidable aquatic resource impacts. If permitee-responsible compensation is considered, it is preferrable to be located within one of the watersheds where impacts would occur and could entail making improvements to existing infrastructure (e.g., replacing a stream crossing).

Environmental Justice (EJ)

Our 2022 NEPA comment letter recommended the NEPA analysis incorporate feedback from affected Tribes when making decision regarding the project. We continue to recommend the DEIS describe issues raised during government-to-government consultations and how those issues were addressed. Additionally, we recommend the NEPA analysis consider potential impacts to communities with EJ

[4] 40 C.F.R. § 230(a).
[5] Provided that it complies with other portions of the Guidelines.
[6] 40 C.F.R. § 230.10(a)(2).
[7] 40 C.F.R. § 230.10(d).
[8] 40 C.F.R. § 230.10(d).
[9] 40 C.F.R. § 230.93(f)(1).

concerns, including addressing the potential displacement and relocation of impacted communities and vulnerable local businesses, including minority-owned.

The EPA notes that subsequent to our 2022 letter, CEQ issued its Phase II NEPA regulations.[10] One key recommendation includes discussing, as part of the environmental consequences, the potential for disproportionate and adverse human health and environmental effects on communities with EJ concerns. Also, E.O. 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All*, published April 26, 2023, directs federal agencies, as appropriate and consistent with applicable law: to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with EJ concerns. Section 3 (b)(i) of E.O. 14096 also directs the EPA to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with EJ concerns when carrying out responsibilities under Section 309 of the Clean Air Act, 42 U.S.C. 7609. In light of recent federal guidance, the EPA recommends the DEIS identify potential impacts to communities with EJ concerns and consider mitigation measures and opportunities for effective and meaningful public engagement.[11]

The EPA notes that EJScreen, the EPA's nationally consistent EJ screening and mapping tool, was recently updated (version 2.3). We recommend the DEIS consider updated data on local communities. In addition, the EPA recommends identifying transient users of the project area to identify potential EJ concerns, consistent with Promising Practices for EJ Methodologies in NEPA reviews, which states that agencies can be informed by determining if any minority or low-income transient populations (e.g., Tribes, indigenous populations) may be affected (e.g., may reside elsewhere but come within the affected area for subsistence fishing or to collect traditional medicines) by the project.

Air Quality

The EPA recommends the DEIS discuss air quality impacts from project construction, maintenance, and operations with respect to criteria air pollutants and air toxics. Also discuss the direct, indirect, and cumulative impacts of project related air emissions (e.g., potential downwind air quality impacts). Disclose current representative background criteria air pollutant concentrations in the project area, compared to state and federal ambient air quality standards and disclose any other air quality regulations and requirements related to the project. We recommend coordinating with Washington Department of Ecology to ensure federal and state air quality standards will be met. Please note that on May 6, 2024, the EPA revised the primary annual $PM_{2.5}$ standard by lowering the level from 12.0 $\mu g/m^3$ to 9.0 $\mu g/m^3$.

The EPA recommends the DEIS address potential air quality impacts during the construction period to reduce construction emissions, including fugitive dust. For example:

- Consider stabilizing open storage piles and disturbed areas by covering or applying water, chemical, or organic dust palliative where appropriate.

[10] CEQ Phase II NEPA regulations, May 2024. 40 CFR 1502.16

[11] https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf. Accessed 11/27/2024.

- Consider wind fencing and phase grading operations where appropriate.
- Consider a construction traffic and parking management plan that maintains traffic flow.
- Identify sensitive receptors in the project area, such as daycare centers, schools, nursing homes, hospitals, and other health-care facilities, and minimize impacts to these populations.
- Utilize cleanest available fuel engines in construction equipment and consider opportunities for the reduction of idling emissions or electric-powered construction equipment.

Green Infrastructure

The proposed project includes new infrastructure construction, which provides an opportunity to design features that utilize green construction techniques and reduce waste. The EPA encourages the implementation of infrastructure to improve energy efficiency, minimize embodied carbon by sourcing sustainable materials, prepare for net-zero operations, and reduce stormwater runoff in onsite stormwater management features.[12]

Climate Change

Recent CEQ regulations[13] recommend agencies discuss reasonably foreseeable climate-change related effects, including the quantification of greenhouse gas emissions where feasible; relevant risk reduction, resiliency, or adaptation measures; and the analysis of any adverse environmental effects of the no action alternative. The EPA encourages project planning to consider ongoing and projected regional and local climate change and ensure robust climate resilience/adaptation planning in the project design. Evidence indicates that climate change alters the intensity, frequency and duration of some natural hazards (e.g., extreme temperatures, storms, flooding). Traditional safety features and design standards may be incongruent with current and anticipated conditions.

Furthermore, the EPA recommends the DEIS discuss reasonably foreseeable direct and indirect greenhouse gas emissions that will result from proposed construction, operations, and maintenance activities. Estimated emissions can serve as a useful proxy for assessing relative effects, comparing alternatives, and supporting the need for practicable mitigation to reduce impacts.

[12] https://www.epa.gov/green-infrastructure. Accessed 11/26/2024.
[13] CEQ Phase II NEPA regulations, May 2024. 40 CFR 1500.16.

Sound Transit Projects - Communications (1 Total)

Search Term

556636

Communication ID: 556636 - Carrie Staley Court Reporter BLE Scoping comment

Communication (11/7/2024)

Carrie Staley Court Reporter BLE Scoping comment

I'm the reentry center administrator for the Department of Corrections. The Department of Corrections leases the building at 410 4th Avenue and has been a residential reentry center, formerly known as a work release, since 1978, and we plan to remain at the site for as long as possible. We refer to the site as Reynolds Reentry Center. To date there have been 10,089 people who have had the opportunity to transition from prison to the King County community since the location has been cited for use as a reentry center. A 2007 Washington State Institute for Public Policy study found a lower recidivism rate for people who have a reentry path by progressing from prison through a reentry center on their pathway home at a 2.8 percent rate.

At the time of this study, the return on investment was $3.82 of benefit per dollar of cost, which stemmed from the future benefits to taxpayers and crime victims from reduced recidivism. We are obligated to provide safe and humane physical plants to incarcerated individuals including kitchen facilities. We also need programming space for residents, office space, et cetera. This is a 24/7 facility with staff onsite and includes 120 beds over six housing unit floors as well as common spaces. This site also employs 36 state staff. RCW 72.65.220 covers the facility citing process for reentry centers and includes public hearings and notifications. The last attempt to expand beds in King County in 2019 was unsuccessful in citing after many, many attempts.

The residents at Reynolds Reentry Center are minimum security status incarcerated individuals who have worked through behavioral concerns, programming needs, substance use treatment in order to transition home through a reentry center and provide them a better opportunity for a successful reintegration. The loss of this site at 410 4th Avenue for returning citizens would be devastating.

Owner(s):

Contact ID	Name	Type	Phones	Email
1110786	Carrie Stanley	Individual	+1 (360) 480-3921	carrie.stanley@DOC1.WA.GOV

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Sound Transit Projects - Communications (1 Total)

Search Term

556349

Communication ID: 556349 - Reynolds Reentry Center BLE Scoping Comment

Communication (11/6/2024)

Reynolds Reentry Center BLE Scoping Comment

Department of Corrections leases the building at 410 4th Ave and has been a residential Reentry Center (formerly known as work release) since 1978 and we plan to remain at that site for as long as possible. We refer to the site by the name Reynolds Reentry Center. To date there have been 10,089 people who have had the opportunity to transition from prison to the King County community since the location has been sited for use as a Reentry Center.

A 2007 Washington State Institute for Public Policy study found a lower recidivism rate for people who have a reentry path by progressing from prison through a reentry center on their pathway home at a 2.8 percent rate. At the time of this study, the return on investment was $3.82 of benefit per dollar of cost which stem from the future benefits to taxpayers and crime victims from reduced recidivism.

We are obligated to provide safe and humane physical plants including full kitchen facilities as we are responsible for meals. We need to consider space needs for residents and office space for staff. This is a 24/7 facility with staff on site and includes 120 beds over six housing unit floors as well as a gym area, dining room, commercial kitchen, programming space, and common areas for TV rooms and gathering spaces for small groups. In addition to residents, the site employs 36 state staff.

RCW 72.65.220 covers the facility siting process for Reentry Centers and includes public hearings and notifications. Below is a link to a website with information related to our last attempt at siting new locations. I also added a link directly to the locations we were looking at starting 2019 and all sites in King County were unsuccessful in siting.

Reentry Center Expansion | Washington State Department of Corrections

Work Release Expansion Project Evaluated Sites (wa.gov)

The residents at Reynolds Reentry Center are minimum security status incarcerated individuals who have been determined to be eligible and suitable for placement at a residential Reentry Center per WAC 137-56. The residents are transitioning from prison to the community and the reentry centers serve as a progressive step to help people support their reentry goals for successful reintegration.

Owner(s):

Contact ID	Name	Type	Phones	Email
1110786	Carrie Stanley	Individual	+1 (360) 480-3921	carrie.stanley@DOC1.WA.GOV
1111824	Reynolds Reentry Center	Organization		

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December 9, 2024

Ballard Link Extension Scoping
Attn: Ms. Lauren Swift
Sound Transit
401 S Jackson St
Seattle WA 98104
Via email: *BLEScoping@SoundTransit.org*

Re: Ballard Link Extension Scoping

On behalf the Port of Seattle (Port) and Northwest Seaport Alliance (NWSA), thank you for the opportunity to provide additional scoping comments for the Ballard Link Extension (BLE) environmental review. Together, we submitted scoping comments on April 2, 2019, as well as Draft Environmental Impact Statement (DEIS) comments on 4/28/2022 on the W Seattle and Ballard Link Extensions (WSBLE), covering much of the same areas. Rather than repeat those comments, our goal is to identify issues newly identified related to alternatives or elements of the environment. However, for the multiple WSBLE DEIS questions north of S Lander St, the WSLE FEIS noted that those would be addressed as part of the Ballard Link EIS process, and we look forward to the responses for those as well. We hereby incorporate our prior input by reference. Please note, the input of the NWSA is confined to the SODO Segment, in the comments below.

Thank you for your invitations to the Port to serve as a Cooperating Agency and to the NWSA as a Participating Agency. We believe these roles will further the ongoing cooperation between our agencies.

We appreciate Sound Transit's additional studies since the 2022 DEIS on the alternatives for the extension to Ballard, and the direct engagement of design and planning staff with agencies in the proposed alignments. Sound Transit staff has worked with Port and NWSA staff to better understand concerns near port terminals both during construction and during link light rail operations. However, proposed Ballard Link Extension alternatives between SODO and Ballard have the potential to create negative impacts on port terminals and water-dependent logistic functions, especially with surface transportation access. We must continue our work together to find mitigating measures for construction and operational impacts.

Regional Mobility

We ask that Sound Transit consider carefully regional connectivity in the Link light rail system in balance with cultural vibrancy, construction impacts and constructability. The Seattle stations at CID/SODO and Midtown will provide transfer opportunities among the three other lines: to south Seattle/King County, including SEA Airport, to the North and to the Eastside. The DEIS must identify potential impacts of (a) trade-offs in system users' transfer times, (b) building near the cultural hub that is the CID, (c) the duration of construction impacts and (d) the ability to construct in the alternative locations.

SODO Segment

- The expected impacts from BLE in SODO occur both during construction and long-term operations. During the estimated twelve-year construction period, road or lane closures will impact industrial operations and international container cargo flows, by limiting freight mobility on Seattle's Major Truck Streets and by impacting the businesses that create the network of the logistics and industrial business web in SODO. Further, displacing buses from the E-3 busway means more trips on other streets such as 4th Avenue S, resulting in more large vehicles on roads used by port trucks in the Manufacturing Industrial Center (MIC).
- The Sound Transit proposed Holgate St Overpass from 4th to 6th Avenues must be considered for tradeoffs: between trains blocking surface streets without it versus the impacts to truck mobility (from roadway design changes that make maneuvering trucks through the area more difficult to due to reduced turn-radius at intersections or steeper slopes for trucks to climb on overpasses).
- The BLE DEIS needs to consider cumulative impacts to truck mobility and overall resiliency of the roadway system. For example, on S Holgate St the city of Seattle is conducting a Railroad Crossing Elimination Study (RCES) of the rails between 1st and 4th Avenues South. Sound Transit's transportation modelling should consider the RCES potential scenarios and necessary mitigation of a closure of the heavy rail crossing on Holgate in SODO. The analysis should consider the impacts to system resiliency resulting from reduced roadway connectivity by evaluating the time it takes the system to recover from unexpected incidents and closures.
- Additionally, the BLE DEIS needs to consider cumulative impacts to industrial and maritime businesses, including physical changes to the road network and business access that may negatively impact truck movements or the ability of existing businesses to operate.
- For construction impacts mitigation, Sound Transit will be constructing the West Seattle Link Extension from Holgate St to the south to West Seattle. Any lessons learned for protecting our industrial economic sector should be applied to this portion from Holgate to the north.

South Interbay Segment

- Please consider alternate construction methods to eliminate or minimize closures of the Galer St Flyover. We ask that you recognize this is the primary access to Terminal 91 through the Main (East) Gate. Access through the West Gate does not have sufficient capacity, nor is it configured to accommodate the truck and vehicle volumes. Terminal 91 is a 200-acre facility which hosts our two-berth Smith Cove Cruise terminal, fishing and seafood processing ships and businesses, and other light industry businesses at T-91. As noted in scoping comments, it's busy year-round; during cruise season (April-Oct), entry and exit vehicle counts are over 10,000 on a peak day. Additionally, the Port is pursuing design and permitting for additional buildings at T-91, so access needs will be growing. We will want to coordinate closely on minimizing impacts to current and future tenants.
- The construction road (or lane) closures identified to date, as well as the duration, will impact industrial activities in the Ballard/Interbay/North Manufacturing & Industrial Center (BINMIC), including fishing and cruise operations, by significantly limiting access or contributing to traffic congestion on Seattle's Major Truck Streets, such as Elliott Way and 15th Avenue W.
- Permanent impacts to freight mobility from placement of the light rail guideway and piers should be minimized in the BINMIC, due to safety, mobility and economic considerations.

- Please consider how Smith Cove and Interbay station locations within BINMIC have the potential to capture potential riders from Port properties, including employees and cruise passengers. What opportunities are there to connect the Interbay Station at Dravus to the visitors and businesses at Fishermen's Terminal?
- We have discussed the potential for light rail utilities to be located on Port property on the former Tsubota Steel site and will consult with you on potential impacts of that siting and access.

Interbay/Ballard Segment

- The road (or lane) closures identified to date, as well as the duration, may impact industrial operations and freight mobility by significantly limiting access or contributing to traffic congestion on Seattle's Major Truck Streets, such as 15th Ave W.

Conclusion

The Port and NWSA look forward to continued collaboration with Sound Transit and other agencies and stakeholders to consider the alternatives that uphold the importance of the Port's economic development mission, and its ability to continue producing family wage jobs and uplift the quality of life in the region. We will continue to be staunch advocates to support an integrated and robust transportation system that is essential to maintaining Puget Sound's economic competitiveness.

We ask that these impacts effects be fully vetted through the environmental review process. Thank you for your consideration and please anticipate our continued involvement.

Sincerely,

Geraldine Poor
Regional Transportation Senior Manager
Port of Seattle

Deirdre Wilson, AICP
Senior Planning Manager
Northwest Seaport Alliance

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Puget Sound Regional Council

1201 Third Avenue, Suite 500, Seattle, WA 98101-3055 | psrc.org | 206-464-7090

December 9, 2024

Ballard Link Extension
Lauren Swift
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Re: Ballard Link Extension Scoping Comments

Dear Ms. Swift:

The Puget Sound Regional Council appreciates the opportunity to comment on the Ballard Link Extensions Scoping document. Implementation of high-capacity transit to support growing communities and provide options for regional mobility is fundamental to the success of VISION 2050, the region's integrated long-range strategy for growth management, transportation and economic development. The Regional Transportation Plan includes extension of high-capacity transit in this corridor as a vital component of enhancing mobility and providing travel choice in the region. Accordingly, PSRC has an ongoing interest in high-capacity transit system planning for the downtown Seattle to Ballard corridor and has been designated as a Participating Agency in this project.

VISION 2050 is centered around a Regional Growth Strategy. The Regional Growth Strategy focuses on locating growth in regional growth centers and near current and future high-capacity transit facilities. Allowing for greater employment and population growth within walking distance to high-capacity transit promotes the use of the region's transit systems and reduces the number of trips that require a personal vehicle. VISION 2050 includes a goal for 65% of the region's population growth and 75% of the region's employment growth to be in regional growth centers and within walking distance of high-capacity transit. This regional scale goal provides a benchmark to inform local planning and continue to focus new growth as transit investments come into service.

PSRC applauds Sound Transit for their work on Racial Equity with the Racial Equity Toolkit and encourages continued work to include marginalized communities in decision making. We commend Sound Transit for their work to date on the West Seattle and Ballard Link Extensions Project and specifically the DEIS effort. Some of our comments on the DEIS also apply to this separate Scoping document. The Ballard Link Extension Scoping document spans the growth management, transportation, and economic development arenas for which PSRC oversees long-range regional planning. The Scoping document has therefore been reviewed by transportation and growth management department staff. Sound Transit is encouraged to consider the following as the process continues:

Travel time and transit access. PSRC recognizes the importance of comparing alignment and station alternatives in terms of the resulting light rail travel time. An important component that we commented on in the past is door-to-door travel time for transit passengers. Many of the stations under consideration are elevated or in tunnels, which provides for grade separation, but could also add travel time for accessing or transferring at the stations. This is especially important with the potential transfer between light rail lines in the Chinatown/International District area and the distance between stations in various alternatives. We encourage Sound Transit to ensure these stations allow for comprehensive access and easy connections by all individuals, particularly people with accessibility and mobility needs, such as older adults and people with disabilities. Doing so will help both reduce travel times for passengers and improve fire and safety emergency preparedness.

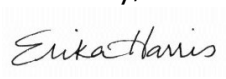
Displacement risk. VISION 2050 includes a goal to preserve, improve, and expand housing stock in the region to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. Many transit communities are home to existing low- and moderate-income households at potential risk of displacement due to increased market strength and gentrification that may accompany transit system development. Station construction, although temporary, may further increase that risk. We encourage Sound Transit to continue to analyze displacement risk and include mitigation measures to ensure all people can continue to live in and have access to thriving transit communities.

Potential impacts to different populations and communities. The PSRC Regional Economic Strategy encourages support for small and medium sized businesses and businesses owned by marginalized communities, including BIPOC, women and immigrant-owned businesses. We encourage Sound Transit to continue to identify ways to mitigate impacts to local businesses and encourage Sound Transit to further support businesses owned by marginalized communities that may be impacted by these projects.

TOD potential. Promotion of transit-oriented development (TOD), characterized by compact, walkable, mixed-use development, is key to implementing the objectives of VISION 2050 and the Regional Transportation Plan. Incorporating TOD in the environmental review of potential high-capacity transit station areas and alignments is an important step toward Sound Transit choosing its investments with current and future land use in mind, and in doing so, building a transit system that supports community building. As planning for the region's critical high-capacity transit system progresses, we encourage Sound Transit to continue to include TOD as a central component of its analysis, think beyond the existing land use patterns and local planning efforts, and fully consider the best ways and locations to achieve equitable TOD, a cornerstone goal of the VISION 2050 Regional Growth Strategy.

The Ballard Link Extension project is an important long-range investment for our region. We commend Sound Transit again for the Scoping effort. We appreciate the opportunity to comment and participate. If you have any questions regarding our comments, please contact Erika Harris, SEPA Responsible Official, at (206) 464-6360 or eharris@psrc.org.

Sincerely,



Erika Harris, AICP
SEPA Responsible Official
Puget Sound Regional Council

cc: Kelly McGourty, Director of Transportation Planning
Ben Bakkenta, Director of Regional Planning

Charles Patton, Program Manager – Equity Policy and Initiatives
Liz Underwood-Bultmann, Principal Planner
Philip Harris, Principal Planner

Seattle Department of Transportation

December 9, 2024 *Via email*

Lauren Swift
lauren.swift@soundtransit.org
Central Corridor Environmental and Business Operations Manager
Sound Transit

Dear Ms. Swift,

The City of Seattle (City) appreciates the opportunity to comment on the Federal Transit Authority's and Sound Transit's scoping process for the preparation of the Ballard Link Extension (BLE) Environmental Impact Statement (EIS) (EISX-021-36-R10-1728553542). The City supports Sound Transit's articulation of the BLE project's purpose and need; the alternatives being evaluated; and identification of the types of short-term construction, long-term operational, and cumulative impacts that Sound Transit intends to evaluate and mitigate in the EIS.

Over the past seven years, Sound Transit has been developing and evaluating a range of alternatives for the Ballard Link Extension project. The City has actively participated in the environmental review process for the West Seattle and Ballard Link Extension (WSBLE) as a cooperating agency during that time. The City provided preliminary scoping comments on March 5, 2018 to encourage Sound Transit to keep certain priorities in mind as it developed alternatives. From February 19 to April 2, 2019, Sound Transit conducted a public scoping process for the WSBLE Draft Environmental Impact Statement (DEIS). The City provided extensive scoping comments on April 2, 2019 as part of that scoping process. The City's comments emphasized flexibility when developing alternatives; elevating equity and mitigation particularly in the Chinatown/International District and in the Delridge areas; and consistency with City plans, policies, and regulations.

As a Cooperating agency, the City had the opportunity to review the WSBLE Administrative DEIS and provided detailed comments on May 13, 2021. The City's comments discussed, among other things, the project alternatives and concerns about impacts, technical challenges, and design issues associated with segments and station alternatives. Nearly 100 City staff from over 15 City Departments reviewed the subsequent January 28, 2022 WSBLE DEIS; the City's April 28, 2022 extensive letter with over 1,500 individual comments again discussed the project alternatives.

In July 2022, after the 2022 publication of the WSBLE DEIS and the end of the public comment period, Sound Transit Board directed staff to prepare further studies on numerous aspects of the Ballard alignment, including refinements to station locations and to the alignment. The Further Studies process occurred from August 2022 to March 2023, and the City was actively involved in the Further Studies process and provided input into the refinements that led to changes in the existing alternatives. After the close of that Further Studies process, the Sound Transit Board asked staff to analyze different station location options at South Lake Union and Denny area and report back to the Board. The City was informed and participated in some of that additional work from 2023 to 2024.

Given the exhaustive process to date, the City believes that Sound Transit has identified a reasonable range of feasible alternatives that meet the BLE project's purpose and need. The City supports Sound Transit's development of a BLE Draft EIS pursuant to the National Environmental Policy Act (NEPA) and BLE Supplemental EIS pursuant to the Washington State Environmental Policy Act (SEPA) based upon the

previously identified purpose and need statement and the alternatives that have been developed over the past few years.

The City is eager to partner with Sound Transit as this scoping process ends and Sound Transit moves forward with the next stages of the environmental review process. The City encourages Sound Transit to ensure that the BLE DEIS fully analyzes the impacts of the alternatives, particularly adverse cumulative construction impacts anticipated from Sound Transit's WSLE and BLE projects and other simultaneously planned transportation projects throughout the region. This light rail project will be transformative to our City. However, cumulative impacts from construction activity in some areas of the City will last multiple years and result in significant adverse impacts on transportation, the natural environment, our local economy, neighborhoods, and businesses and residents. As Sound Transit moves forward with environmental, planning, and design phases, Sound Transit should proactively plan and develop robust mitigation to address project impacts and address community concerns about lengthy adverse construction impacts.

Sincerely,

Jill Macik (Dec 9, 2024 11:23 PST) 12/09/2024

Signature Date

Jill Macik, SEPA Responsible Official, Department of Transportation, City of Seattle

Elliot Helmbrecht (Dec 9, 2024 11:54 PST) 12/09/2024

Signature Date

Elliot Helmbrecht, ST3 Designated Representative, City of Seattle

cc:
Mayor Bruce Harrell
Deputy Mayor Adiam Emery
Seattle City Council Member Dan Strauss
Greg Spotts, Director, SDOT
Elizabeth Sheldon, Chief Infrastructure Officer, SDOT
Sara Maxana, Sound Transit Program Director, SDOT
CJ Holt, ST3 Program Manager, SDOT
Amy Chasanov, ST3 Mitigation and Concurrence Manager, SDOT
Vera Giampietro, BLE Project Manager, SDOT

FACILITIES
UNIVERSITY of WASHINGTON
Campus Architecture & Planning

Lauren Swift
Central Corridor Environmental Manager
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Sent via email to lauren.swift@soundtransit.org and blescoping@soundtransit.org

RE: Comments for Ballard Link Extensions Draft EIS

The University of Washington appreciates the opportunity to comment on the Ballard Link Extension (BLE) project scoping for a new Draft Environmental Impact Statement (Draft EIS). The University commented previously on the earlier West Seattle and Ballard Link Extensions Draft EIS and those comments are attached so they will carry forward in this latest BLE Draft EIS.

The University supports the expansion of light rail through the Ballard Link Extension. Light rail is an increasingly important component of the University's efforts to shift students and employees away from single-occupancy-vehicles (SOV) and onto transit. It has helped to lower our SOV rate to one of the lowest of any major employer in the region. Expanding light rail capacity will create new opportunities for our commuters to reach campus.

We request Sound Transit consider the following when preparing the new BLE Draft EIS:

Metropolitan Tract

The University owns approximately ten acres of land downtown between Spring and Union Streets, 3rd Avenue and 6th Avenue. Known as the Metropolitan Tract (Metro Tract), this was the location of the original campus and today includes a number of significant commercial buildings including the Fairmont Olympic Hotel, Rainier Tower, Rainier Square, Skinner Building, Cobb Building and others.

In the latest preferred alternative, it appears the new route goes directly under several buildings on the Metro Tract. The University requests the following questions be studied:

- What is the impact on future development of these sites and adjacent sites from the tunnel underneath? What limitations would this place on the depth of future construction for these sites? What additional requirements would be needed to build above the tunnel, or adjacent to it, and what would those add in cost to construction?
- What is the impact on existing Metro Tract buildings during construction? Would this create settlement, vibration or noise impacts for these buildings?
- Are there alternatives that do not go under buildings on the Metro Tract? Are there alternatives that do not go through the Metro Tract?

- How will construction impact access via all transportation modes to the Metro Tract and how can access be preserved?
- What impacts will occur for street-level retail in the Metro Tract during construction and how can these impacts be mitigated to support these businesses?

South Lake Union

UW Medicine operates several buildings on Republican Street in South Lake Union that provide primary and specialty care together with clinical research. Some of these have vibrationally and electromagnetically sensitive research activities. UW requests the following questions be studied:

- Will the preferred alternative create any vibration or electromagnetic impacts for the research at these buildings?
- Many of the patients at these buildings come by car. What will the impacts be on car access to these buildings during construction and how can access be maintained?
- Is it possible for Sound Transit to use the 7th and Harrison station location for future Transit Oriented Development?

Thank you for considering our requests. We look forward to reviewing the BLE Draft EIS when it is ready.

Sincerely,

Julie Blakeslee, AICP
SEPA and Land Use Officer
UW Facilities, Asset Management

jblakesl@uw.edu

Attachments:

- UW ST3 DEIS Letter 040722
- UW Scoping Letter for ST3 100219

FACILITIES
UNIVERSITY of WASHINGTON
Campus Architecture & Planning

April 8, 2022

Sound Transit
401 S. Jackson Street
Seattle, WA 98104

Sent via: wsbledeiscomments@soundtransit.org

RE: Comments for West Seattle and Ballard Link Extensions Draft EIS

Thank you for the opportunity to express both our general support for, and specific concerns with the proposed West Seattle to Ballard Link alignment. The University of Washington supports the expansion of light rail transit in the Puget Sound Region to serve residents, employees, and visitors. We understand Sound Transit has analyzed alignment alternatives, including a preferred alternative, in the Draft Environmental Impact Statement. For your consideration in selecting an alternative for the route and station locations, we provide information about our preference in South Lake Union near our UW Medicine biomedical research facilities and Downtown Seattle near our Metropolitan Tract properties.

UW Medicine Biomedical Research Facilities in South Lake Union

The UW Medicine facilities at South Lake Union consist of five existing biomedical research and clinical buildings and one administrative and dry lab office building. The facilities are located on multiple parcels of land between Mercer and Republican Streets, and Dexter and 9th Avenues. They range in height from 4 to 8 stories and sit above 3-story, below-grade parking and service levels with close to 700,000 square feet (sf) of occupied space above grade and approximately 310,000 sf of below grade parking and service space. UW Medicine has actively supported the City of Seattle's South Lake Union planning and rezoning efforts and worked extensively with city staff to assure each building's use and design support the neighborhood plans and policies.

The facilities contain highly sensitive receptors and experiments which could be subject to potential significant impacts due to construction and operation of light rail near the buildings. Vibration and EMI impacts, in particular, could diminish or completely prevent the research that the individual buildings and this complex was specifically built to provide.

<u>South Lake Union DT-1 Preferred Alternative Support and Potential Impacts</u>

The UW supports the DT-1 Preferred Alternative through South Lake Union.

Bus transit connectivity is an important element of station area planning. Sound Transit, Metro, and SDOT working together for a Harrison/Aurora Ave Mobility Hub is supported by the proposed Harrison/7th Avenue Link station.

The UW is concerned about the impacts of street closures during construction in South Lake Union. The information available from Sound Transit so far is insufficient to understand whether predicted closure time periods are concurrent or sequential, and what tools SDOT and Sound Transit will employ to ensure pedestrian, bicycle, truck and auto access through affected areas.

UW Metropolitan Tract in Downtown Seattle

The University owns multiple contiguous parcels of land in downtown Seattle between Union and Seneca and between 3rd and 6th Avenues, including some of the street right of way (the Metropolitan Tract and related properties). The University may pursue redevelopment of select properties in this area. Redevelopment could include below grade space that is deeper than what exists today.

Downtown Seattle DT-1 Preferred Alternative Potential Impacts

The UW is concerned about the impacts of street closures (4th and 5th Avenues in particular) during construction in Downtown Seattle. The information available from Sound Transit so far is insufficient to understand whether predicted closure time periods are concurrent or sequential, and what tools SDOT and Sound Transit will employ to ensure pedestrian, bicycle, truck and auto access through affected areas, and access to businesses adjacent to these routes. The street closures, noise and general disruption to the University-owned properties on the Metropolitan Tract is something we would like to better understand.

Vibration impacts from construction and operation continue to be of concern for the Metropolitan Tract buildings and tenants that are in very close proximity to the Preferred Alternative along 5th Avenue Downtown (e.g., 5th Avenue Theater, hotel, dining, retail, and office uses). It is noted in the Draft EIS that the depth of the tunnel in this area would result in no impact. The level and intensity of vibration to potentially impact surrounding receptors during construction and operation should be prepared for and mitigated as needed.

Thank you for your consideration of our concerns and comments. We appreciate the conversations we have had with Sound Transit staff and general outreach opportunities.

Sincerely,

Julie Blakeslee, AICP
SEPA and Land Use Officer
UW Facilities, Asset Management

jblakesl@uw.edu

FACILITIES
UNIVERSITY of WASHINGTON
Capital & Space Management

October 2, 2019

Sound Transit
401 S. Jackson Street
Seattle, WA 98104

Sent via: wsblink@soundtransit.org

RE: Scoping Comments for West Seattle to Ballard Link Alignment Options

Thank you for the opportunity to express both our general support for, and specific concerns with the proposed West Seattle to Ballard Link alignment. The University of Washington supports the expansion of light rail transit in the Puget Sound Region to serve residents, employees and visitors. We look forward to continuing to discuss Sound Transit's plans. We understand Sound Transit has identified two alternatives, including a preferred alternative, to evaluate in an Environmental Impact Statement. For your consideration in the analysis of alternatives for the route and station locations, we provide information about our concerns for the segment of this alignment in South Lake Union near our UW Medicine biomedical research facilities and Downtown Seattle.

UW Medicine Biomedical Research Facilities in South Lake Union

The UW Medicine facilities at South Lake Union consist of four existing biomedical research and clinical buildings and one administrative and dry lab office building. The facilities are located on multiple parcels of land between Mercer and Republican Streets, and Dexter and 9th Avenues. They range in height from 4 to 8 stories and sit above 3-story, below-grade parking and service levels with close to 700,000 square feet (sf) of occupied space above grade and approximately 310,000 sf of below grade parking and service space. UW Medicine has actively supported the City of Seattle's South Lake Union planning and rezoning efforts and worked extensively with city staff to assure each building's uses and designs support the neighborhood plans and policies.

The facilities contain highly sensitive receptors and experiments which could be subject to potential significant impacts due to construction and operation of light rail near the buildings. Vibration and EMI impacts, in particular, could diminish or completely prevent the research that the individual buildings and this complex was specifically built to provide.

South Lake Union ST Alignments

The map illustrating the Preferred Alternative and other alternative are not specific enough to determine the exact route and station locations. We have concern for any alternative alignments in the South Lake Union/Denny neighborhood that run near our below (and above)

ground facilities along Mercer St. and Republican St. The blue "other alternatives" may be of greater concern. The University has concerns as described below.

Scope of Impact Analysis Required

We believe significant unavoidable impacts could occur and that the following scope of analysis is required to determine those impacts and to inform Sound Transit's decisions regarding the selection of the ultimate Link light rail alignment. Our reasons are set forth below. They are also informed by the joint understanding we have with Sound Transit around testing, identification and resolution regarding impacts to sensitive receptors associated with the construction and operation of Sound Transit's University of Washington Station and future U District Station.

Vibration – As noted above, highly sensitive receptors to vibration are in very close proximity to the proposed Link alignment. The level and intensity of vibration on surrounding sensitive receptors from construction and operation of Link light rail due to proximity, depth, soil conditions, and other factors should be analyzed and demonstrated. Please note the variable soil and ground water conditions described below.

Electromagnetic Interference (EMI) – As noted above, highly sensitive receptors to EMI are in very close proximity to the proposed Link alignment. The level and intensity of EMI on surrounding sensitive receptors from construction and operation of Link light rail due to proximity, depth, soil conditions, and other factors should be analyzed and demonstrated.

Geology/Soils – Soil conditions greatly affect the ability to construct light rail (and its cost) and affect vibration and EMI. Light rail alignments have sometimes had to be moved later in the planning or design process due to the discovery of soil conditions. It is imperative that the soil conditions in this South Lake Union area (where the soils are known to be varied or poor and, in some places, contaminated) be thoroughly analyzed and well understood. Based on recent construction activities involving the UW Medicine buildings, we know the soil conditions are varied across the 750 and 850 blocks. Soils on the west side of the complex were comprised primarily of glacial till while soils on the east side were primarily loose fill as part of the Denny regrade. Contaminated soils were identified and removed as part of construction.

Construction Impacts – Impacts to sensitive receptors related to tunneling and station construction, proximity to significant construction truck trip pathways, and potential utility disruption should be analyzed and resolved.

Groundwater – Groundwater conditions can affect the ability to construct light rail and may result in long-term flow control issues. Based on recent work on the UW Medicine facilities, we know that groundwater elevation in the area generally ranges from 16 to 27 feet, which is approximately 20 to 30 feet below the first-floor building elevations. Parking and service levels in UW Medicine's buildings extend below the groundwater table.

Downtown Seattle

The University owns multiple contiguous parcels of land in downtown Seattle between Union and Seneca and between 3rd and 6th Avenues, including some of the street right of way (the Metropolitan Tract and related properties). The University may pursue redevelopment of select properties in this area. Redevelopment could include below grade space that is deeper than what exists today.

Downtown ST Alignments

Sound Transit Motion No. M2019-51 includes only general descriptions of potential station locations Downtown. Due to the reasons stated above we support an alternative that would have the least potential impact on the Metro Tract and related UW properties.

Scope of Impact Analysis Required

The same scope of impact analysis is recommended for this area of Downtown as listed above for the South Lake Union area with the addition of property ownership, utilities and right of way.

Thank you for your consideration of our concerns and comments. We appreciate the conversations we have had with Sound Transit staff and appreciate the opportunity to discuss these scoping issues with you.

Sincerely,

Julie Blakeslee, AICP
SEPA and Land Use Officer
UW Facilities, Asset Management

jblakesl@uw.edu

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Seattle
Design Commission

December 17, 2024

Lauren Swift
Central Corridor Environmental and Business Operations Manager
Sound Transit
lauren.swift@soundtransit.org

Subject: Ballard Link Extension - Additional EIS Scoping

Dear Ms. Swift,

The Seattle Design Commission offers comments for the additional EIS scoping for the Ballard Link Extension (BLE). We apologize for sending out comments after the deadline for public comment, and request that they still be considered. The comment period for BLE was during a time when we were busy with WSLE preliminary engineering reviews.

The Seattle Design Commission advises the Mayor, City Council, and City departments on the design of capital improvements and other projects and policies that shape Seattle's public realm. In this role, we have been evaluating and providing advice on Sound Transit's (ST) West Seattle and Ballard Light Rail Extension (WSBLE) projects since 2019.

Members of the Seattle Design Commission (SDC) visited sites along the BLE corridor in November 2024. They looked at publicly available early designs of the preferred alternatives for stations and considered the designs within the built context of the neighborhoods. The focus was on places where the preferred alternative changed after the DEIS was released as a result of further studies. Commissioners considered possible impacts and opportunities. They developed a list of information and analysis that should be provided in the additional DEIS. Providing the information and analysis identified by the SDC will aid us, communities, and leaders in evaluating and deciding which are the best alternatives. It will also help determine how the new facilities can be designed to optimize environmental outcomes.

The SDC requests that the following information be included in the BLE EIS.

CID

First are nine topics that relate to all CID Alternatives:

1. Study the opportunities of joint station and TOD development to address displacement and social justice impacts. Provide scenarios for both conventional development and for

development that addresses social impacts, such as with non-profit partners and including affordable commercial and community space.

2. Study the cultural preservation opportunities and impacts on historical and cultural landmarks in the CID. Identify impacts and opportunities to preserve the community's cultural roots and prevent the erasure of vital spaces.
3. Evaluate and compare the potential of the station location alternatives to contribute toward the vitality of more expanded community use of Union Station as explored in the South Downtown Hub workshops in 2024.
4. Evaluate the impact on low-income residents and marginalized communities, with a focus on potential displacement due to rising rents and gentrification. Study how station locations could either protect or harm these communities.
5. Study accessibility for the elderly and people with disabilities. Assess the safety, accessibility, and ease of use of the alternatives for these populations.
6. Assess the community mobility and transit needs of residents who depend on public transit for daily activities. Focus on integration with pedestrian and bus access, particularly for families, elderly residents, and vulnerable populations needing access to healthcare, work, and community spaces. Provide information specific to accessing culturally relevant healthcare, businesses, and civic institutions.
7. Analyze displacement and gentrification risks, with a focus on impacts to low-income residents and affordable housing in the CID.
8. Evaluate the health and environmental impacts of construction, including air quality, noise, and health risks for vulnerable populations such as the elderly or those with pre-existing conditions.
9. Study the public safety and community well-being impacts of station construction, with a focus on pedestrian safety, neighborhood cohesion, and long-term effects on social fabric, particularly for families and vulnerable populations like seniors.
10. Provide clear graphic depiction of the differences in travel distances and times between the alternatives and key locations within the CID. Also indicate any pedestrian safety challenges along those routes.
11. Provide clear comparative analysis of all CID alternatives that allow community to understand all key metrics used for selecting preferred alternative, including metrics indicated as concerns for community members. This includes construction impacts, access and mobility for all populations (especially older community members) during and after construction, potential connections to Union Station, and business displacement for construction.

Next are topics related to specific locations:

12. CID 5th Diagonal alternative: Study the short-term and long-term impacts on small, family-owned businesses, particularly those that are immigrant-owned or long-established in the community. Assess how construction and potential gentrification could affect these businesses.
13. CID 5th Diagonal alternative: Provide analysis on the potential to connect to Union Station below grade. Also, provide information on travel time and experience between the new station and Union Station for the alternatives.
14. CID Dearborn alternative. Study impacts to freight movements and potential change of impacts to pedestrian and bike movements resulting from rechanneling freight traffic/changing the grid.

15. CID 5th Diagonal alternative. Study both short term and long-term opportunities and impacts to businesses.
16. CID and Midtown alternatives. Evaluate access to health care facilities on First Hill from the BLE stations. Evaluate both how those working at and getting services at the institutions get there via bus and walking, biking, and rolling. Compare the alternatives. Study possible improvements to the I-5 vehicular access routes that might improve First Hill access from the new proposed mid-town location.
17. Dearborn CID and nearby existing stations: Stadium CID and Pioneer Square. Analysis to determine how access to Lumen Field might shift if this alternative is selected.
18. Seattle Center Republican west alternative. Study the potential for integrated station entrances with joint development.
19. Seattle Center Republican west alternative. Study integrating current Dick's drive-in as an anchor tenant in joint TOD.
20. Seattle Center Republican. Analyzing land use/redevelopment and rezoning potential on the west end of Uptown, including near the proposed station entrance at 2nd Avenue West.
21. Interbay Dravus alternative. Analyze zoning and redevelopment potential on the north side of Dravus in the station area.
22. Interbay Dravus alternative. Identify the impacts to vehicular traffic during construction to the Magnolia neighborhood in a scenario where the Magnolia bridge is closed.
23. Interbay Dravus alternative. Study a reduced footprint for the station to minimize the amount of loss of parks land.
24. Ballard preferred alternative. Analyze adding a station entrance north of Market St. Evaluate quantitative and qualitative benefits to people moving from north to the station and those transferring to buses. Analyze impact to current pedestrian flows and ingress/egress for Metro busses if additional station entrance north of Market St is not added.
25. Elevated stations and guideways. Study how impacts of elevated structures, both stations and guideways, can be minimized with activating uses in areas where this is possible.

These comments recommend the scope of City of Seattle work that we believe should be done in parallel with the Sound Transit work.

City

1. Provide urban design planning at and study increasing density at the following preferred alternative station locations: Seattle Center, Interbay, Ballard.
2. Provide access and public realm planning in the broader areas and the direct vicinity of the following preferred alternative station locations: Westlake, Midtown, and Smith Cove.

Sincerely,

Jill Crary

Chair, Seattle Design Commission

CC: Amy Chasanov, City of Seattle

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Appendix C

Business and Business Organization Comments

December 9, 2024

Lauren Swift
Central Corridor Environmental Manager
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Sent via email to lauren.swift@soundtransit.org

Dear Ms. Swift,

We appreciate the opportunity to provide input on the Ballard Link Extension (BLE) project scoping for a new Draft Environmental Impact Statement (Draft EIS). We are a coalition of downtown Seattle stakeholders led by the Seattle Metropolitan Chamber of Commerce (Chamber) and Downtown Seattle Association (DSA) working together to plan for light rail construction.

We represent the region's major employers, arts and culture organizations, property owners, freight, sports, and community leaders. We are enthusiastic supporters of expanding light rail and have a strong track record of championing Sound Transit projects throughout the region. We recognize that a new tunnel through downtown Seattle is necessary to extend light rail to Tacoma and Everett.

Our goal is simple – work with Sound Transit and the City of Seattle to keep the Ballard Link Extension on schedule by developing strategic solutions that minimize disruptions during construction and support downtown's vibrancy. We believe that goal is achievable if Sound Transit incorporates the issues highlighted in this letter and the attachments into the new BLE Draft EIS.

Summary

Downtown Seattle's future is bright and poised to capitalize on significant public and private investments and events, such as the new Waterfront Park, the Ocean Pavilion at the Seattle Aquarium, a new Convention Center, and FIFA Men's World Cup 2026. Constructing six stations and two transit tunnels concurrently under downtown Seattle, the region's hub for jobs, arts, sports, and tourism, for 10+ years, will require proactive and innovative strategies and investments not typically used by Sound Transit to avoid irreparable harm.

The new Draft EIS must identify impacts and propose specific mitigation strategies for the concurrent station and tunnel construction, which the 2022 WSBLE Draft EIS did not do. Those concurrent impacts should be based on the current design of the preferred alternative and include all topics typically analyzed in a new Draft EIS, not limited to transportation. The Draft EIS must include mitigation that takes into consideration the 10+ years of construction impacts, which are effectively permanent, not temporary. We look forward to a solution-oriented and collaborative

partnership with Sound Transit and the City of Seattle to be ready for construction so that downtown Seattle remains vibrant, connected and ready to reap the benefits of improved transit service when the BLE opens to riders.

We request Sound Transit consider the following when preparing the new BLE Draft EIS:

Downtown Seattle is the region's hub for jobs, arts, sports, and tourism

Downtown supports more than 337,000 jobs, 106,000 residents, and 3.5 million visitors annually. It is home to six professional sports teams, approximately one million square feet of convention center space, a symphony hall, an opera house, and more than a dozen stages for live theater, dance, comedy, and musical performances throughout the year. That is why the spine of the Puget Sound regional light rail system is adjacent to the I-5 corridor and why the dedicated light rail tunnel and BLE Project through downtown Seattle is needed. It also highlights the layers of complexity that must be considered so that the BLE project is designed, constructed, and delivered with minimal impact to downtown.

Downtown has seen transformative growth over the past two decades—residential population surged by nearly 100% between 2010 and 2020, and business activity expanded at an unprecedented rate, establishing downtown as the region and state's economic engine. Furthermore, the City of Seattle's growth plans focus 50 percent of new jobs and 17 percent of all new housing in this regional center. The growth in housing represents the largest increase of any regional center in the Puget Sound area. As the region's businesses and economic hub, downtown generates significant tax revenues for the state, region, and city through property, sales, excise, and utility taxes.

Additionally, downtown foot traffic is steadily rising, with over 90,000 weekday workers as of mid-2024, marking a 14% year-over-year increase. As major employers such as Amazon and Starbucks increase their in-office presence in 2025, this daily influx of workers will grow further. To ensure light rail expansion enhances rather than disrupts this momentum, it's essential that Sound Transit build's light rail in a way that avoids, minimizes, and mitigates direct, concurrent, and cumulative impacts on downtown, the region, and the state.

Downtown's future is bright and resilient post pandemic

The pandemic resulted in a significant decline of local visitors and office workers downtown as evidenced by the following:

- The average annual frequency of local customers to downtown's core has fallen by almost half, while other regional retail hubs have seen levels return close to pre-pandemic levels.
- Similarly, patrons of downtown's performing arts venues, museums, and attractions have remained below pre-pandemic levels.
- The downtown retail sector has seen nearly a 20 percent decline in jobs since 2010.
- Public safety and public health challenges have placed downtown's recovery at further risk.

Despite these challenges, there are major investments set to transform downtown Seattle in the next decade. With the opening of the new $806 million Seattle Waterfront, Seattle Convention Center expansion, the new Ocean Pavilion at the Seattle Aquarium, and the 2026 FIFA Men's Soccer World Cup, downtown Seattle will welcome millions of local visitors, tourists, and workers. These new and upcoming investments are poised to generate economic growth and vitality for downtown, but this progress is at risk if construction impacts are too disruptive.

Our comments on the new Draft EIS analysis

The BLE will be the single largest infrastructure project in downtown's history. For the purposes of this scoping comment letter, downtown Seattle is defined generally as the area from Mercer Street south to the Chinatown-International District, Pioneer Square and stadium district, and from Interstate 5 west to First Avenue.

The most significant adverse impacts from the BLE project will be construction impacts, a result of constructing six new stations and two tunnels concurrently in the densest urban environment in Washington state. Detailed comments about those impacts are provided in the two attachments.

1. Reflect current design of preferred alternative

Since the 2022 WSBLE Draft EIS was published, Sound Transit has selected and advanced the design of a preferred alternative. This means more is known about the project's footprint and how it will be constructed. Assessing known impacts to inform decision-making is a primary purpose of NEPA. Therefore, it is imperative that Sound Transit disclose all new and additional information in the new Draft EIS so that the related impacts can be thoroughly analyzed and mitigated.

2. Include specific mitigation measures

Sound Transit's proposed approach to the new Draft EIS is to include high-level descriptions of impacts and descriptions of possible mitigation measures. The public will then comment on the Draft EIS – the only comment opportunity after the scoping period – without any detailed information about impacts and mitigation. This leaves the public no opportunity to review and comment on the agency's proposed mitigation measures.

Sound Transit must include in the new Draft EIS more detailed information about impacts to downtown and specific mitigation strategies that address those impacts. This approach will support a collaborative effort by the downtown community with Sound Transit and the City of Seattle during the Draft and Final EIS process to advance practical and achievable solutions for avoiding, minimizing, and mitigating impacts.

3. Analyze impacts of building six stations and two tunnels concurrently.

Six new stations and two new tunnels along a three-mile alignment in the state's densest urban core will require a level of planning, design, coordination, and construction unlike anything Sound

Transit has undertaken to date. Furthermore, the proximity of these stations to each other and the construction sequencing required to ready the stations to accept the tunnel boring machine will necessitate concurrent construction throughout downtown from Seattle Center to the Chinatown-International District for at least 10 years (not including three years of early utility relocation).

The area's geography with Puget Sound on the west and I-5 on the east constrains the downtown transportation grid, which means road closures and congestion impacts reverberate through the network. Sound Transit must study, disclose, and propose mitigation solutions related to the impacts of simultaneous construction of the six stations and tunnels. The 2022 WSBLE Draft EIS assumed localized impacts of each of the six downtown stations without consideration of the other stations. This approach failed to identify and analyze the collective impacts that will occur because of simultaneous construction. This analysis should include all system-wide potential impacts and not be limited to transportation.

For the past decade, downtown has experienced a tremendous amount of construction with the SR 99 tunnel, Alaskan Way Viaduct demolition, new Waterfront, Climate Pledge Arena and other private projects. In the next decade, other construction projects, including the Revive I-5 project, Memorial Stadium, the West Seattle Link Extension, Seattle Transportation Levy investments, and private development will be under way in addition to the BLE project. Post-pandemic, the cumulative disruptions these projects pose to downtown's economic vitality cannot be understated and must be analyzed in the new Draft EIS.

4. Evaluate 10+ years of construction impacts as permanent impacts to be mitigated

The BLE will be perhaps the most impactful construction project for Seattle since I-5 was constructed through the city in the sixties. We must underscore that a decade plus of construction will have a permanent impact throughout downtown Seattle.

The 2022 WSBLE Draft EIS referred to construction impacts as temporary. This characterization does not reflect the one-of-a-kind density of businesses, residences, restaurants, retail, entertainment, arts and culture venues, sports, and tourism destinations downtown, which minimizes the scope and scale of the impacts, and mitigation required. It is also not consistent with the Seattle Municipal Code (23.42.040) that allows for temporary uses not otherwise permitted or meeting development standards as anything less than six months.

Further, these impacts will be wide ranging, and will affect the transportation network, the local and regional economy, access to social services, housing development and job creation, and potential displacement of residents and businesses. Proposed mitigation measures should not be high-level generic solutions but should reflect these specific impacts.

5. Acknowledge impacts, be solution-oriented, and collaborate

A connected, accessible, and vibrant downtown Seattle that remains robust throughout light rail construction is our top priority. Light rail expansion supports the Puget Sound region's economic growth, but it must do so without jeopardizing downtown's quality of life or business operations during construction. We know that this project will have impacts that are significant and long in duration, so we must have a construction approach and mitigation plans that comprehensively address the concurrent and cumulative impacts to minimize disruptions and ultimately deliver broad benefits. Achieving this will define success for the BLE.

We understand that Sound Transit will consider all previous scoping comments and comments on the 2022 WSBLE Draft EIS in the preparation of the new BLE Draft EIS. However, there is much more information available today about the project definition and impacts plus two new station locations. We offer these detailed comments with the goal of ensuring the environmental review process stays on schedule by identifying and addressing impacts as early as possible.

While our letter and the two attachments focus on the six downtown stations, we are strongly supportive of the entire BLE project and encourage Sound Transit to conduct similar analysis for the Smith Cove, Interbay, and Ballard stations.

In closing, we write this letter in the spirit of partnership and collaboration and as longstanding transit supporters, with a shared goal to build the best project as quickly as possible. We know this is achievable – similar large projects have been constructed downtown and serve as models for successful mitigation.

We support a construction approach and mitigation plans that minimize disruptions and ultimately deliver broad benefits. The issues we have raised are consequential to the economic well-being of the entire region and should be evaluated and addressed as such. This project will serve the region for the next century, and we should collectively work towards outcomes that enhance Seattle's growth and vitality in the near and long term.

We thank Sound Transit in advance for addressing these issues in the new Draft EIS.

Sincerely,

amazon

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Attachment 1 - General Comments

Concurrent and cumulative impacts

Since the 2022 WSBLE Draft EIS was published, new public and private projects have been proposed throughout downtown Seattle and the adjacent neighborhoods. The new Draft EIS should analyze the concurrent impacts of excavating and constructing six stations simultaneously as well as the cumulative impacts of public and private project construction occurring at the same time as BLE construction.

For example, in the next decade, other construction projects including the Revive I-5 project, Memorial Stadium, the West Seattle Link Extension, Seattle Transportation Levy investments, and private development will be under way in addition to the BLE project, creating cumulative impacts. It is imperative that Sound Transit and the city, and other government agencies coordinate careful planning to minimize the impact of these projects.

Lack of analysis of specific, concurrent, and cumulative impacts will create unintended consequences for downtown Seattle. The new Draft EIS should include specific mitigation strategies to address those impacts and will be inadequate without this information.

Economic impacts

The 2022 WSBLE Draft EIS did not adequately assess the economic impacts of station construction to downtown Seattle. There were only two paragraphs (Section 4.3.3.4.4) that described the economic impacts of the Downtown Segment and were generic and focused primarily on Seattle Center.

> Businesses in the Downtown Segment that could be affected by construction activities are a mix of art and cultural, retail, service, and offices. Station entrance construction at the surface for all stations in this segment would result in road or lane closures and traffic diversion (see Table 3-28 in Chapter 3 for details on the road closures and durations of closures). Road and lane closures for either Downtown Segment alternative could make access to businesses on those blocks more difficult, but sidewalks would remain for pedestrian access. Most buildings adjacent to road closures are office or residential towers, but disruption from construction activities could affect retail or service businesses on lower floors of these buildings.
>
> Alternative DT-2 would be less disruptive to businesses in the downtown retail core in comparison to Preferred Alternative DT-1 but would require construction in the basement of several retail buildings. With either alternative, road and lane closures

around the Seattle Center Station would cause increased congestion in the area, and could make access to Climate Pledge Arena and other Seattle Center venues and amenities more difficult. Project construction is not expected to notably affect attendance at larger events and performances, such as hockey games. However, there could be effects on event attendance and revenue for smaller events. With Preferred Alternative DT-1, the closure of 2nd Avenue North and August Wilson Way during construction could affect access for maintenance and event vehicles in this area. During construction, Sound Transit would coordinate with Seattle Center to minimize impacts to events on the campus and to permanent tenants. Impacts to freight mobility and access would be minimal and are described in Section 3.19.4.6, Freight and Mobility Access, in Chapter 3

The Alaskan Way Viaduct replacement economic impact study completed in 2006 calculated a negative impact of $3.4 billion annually for each year of viaduct closure. This study was completed almost 20 years ago when Seattle was much less densely developed than it is in 2024, and the viaduct replacement project did not directly disrupt as many economic sectors or geographic submarkets within downtown so for Sound Transit to address economic impacts with two paragraphs in the 2022 WSBLE Draft EIS is inadequate.

Sound Transit must take a different approach to the new Draft EIS. Concurrent construction across downtown – the economic heart of the region and state – for 10+ years will have impacts to the economy from the loss of conventions, tourists, workers returning to the office, high hotel vacancy rates, increased commercial and retail vacancy rates, etc. These impacts cannot be mitigated by detours and businesses are open signs, as suggested in the 2022 WSBLE Draft EIS.

History has shown that major urban transportation infrastructure projects – including transit projects – if not done well, can fundamentally and profoundly damage the neighborhoods through which they pass. The construction of the Third Avenue bus tunnel in Seattle is a classic example of the lasting impact of large infrastructure projects on the built environment and street-level businesses.

Before the bus tunnel was built, Third Avenue was a busy, active street lined with small shops and high foot traffic. The construction put the street level retail out of business; when the bus tunnel opened, the street itself was largely deserted and sterile. Street level crime moved in, and that further dissuaded new businesses. Today, more than thirty years after the bus tunnel opened and despite years of effort to address these concerns, Third Avenue remains an area with significant challenges, including vacant retail spaces, street disorder, and an urban environment that is not welcoming to visitors, transit riders, and workers.

The pandemic demonstrated that blight could occur even in a vibrant city such as Seattle. The downtown retail and hospitality sector struggled as customers stayed away and the same thing can

happen because of BLE construction if closed streets and intersections make it difficult or impossible for pedestrians and motorists to access restaurants, stores, and shops. The owners of those businesses may have no choice but to close, especially given the 10+ years of construction.

On the other hand, with adequate mitigation, a neighborhood can emerge from a transportation mega-project relatively intact. The survival of Pioneer Square and the Waterfront from the seawall and waterfront park construction, the First Avenue water line replacement, the Viaduct replacement and the streetcar construction is evidence of that fact.

The impacts to the following corridors of economic activity in downtown Seattle should be identified in the new Draft EIS:

- Seattle Center attracts over 12 million visitors annually – equally divided between visitors from King County and visitors from Washington State and beyond – to the dozens of unique arts, culture, sports, and educational organizations that employ thousands of people. An economic study conducted in 2016 found that the combined spending of Seattle Center visitors and businesses created $1.864 billion in business activity, 18,621 jobs, and $631 million in labor income in King County in the year 2016. This spending also generated tax revenues of $90 million to state and local governments.
- High density of residents and jobs and street-level businesses and hotels in the South Lake Union and Denny Triangle area, neighborhoods that will be impacted by concurrent construction of the South Lake Union, Denny, and Westlake stations from the closure of streets, relocation of major transit routes, and large construction staging areas disrupting pedestrian and bicycle routes.
- Pike and Pine streets from the Convention Center to the waterfront connect hotels, retail, restaurants, arts and culture organizations, cruise ships, and entertainment venues that are visited by hundreds of thousands of international, U.S., regional, and local visitors annually. These two streets along with Fourth and Fifth avenues will be significantly impacted by Westlake station construction. The visitor spending in this corridor generates substantial revenues for the city of Seattle, King County, and Washington state and employs hundreds of thousands of people. The Pike Place Market alone attracts 10 million visitors annually.
- The Westlake station area is home to regional retail destinations, including Nordstrom's flagship store, Westlake Mall, and Pacific Place. Many retail businesses and restaurants have left the area since the pandemic and there are private and public investments underway to invest in the health of the downtown retail sector. Constructing a station in the heart of the retail district will displace more businesses, which will in turn hurt the remaining retailers, leading to long-term impacts to partnerships and distribution, sales and brand reputation, and major events that attract visitors to the area.
- Both the Pioneer Square and the Chinatown-International districts support a high percentage of small, locally owned businesses, which contribute to the vibrancy of the communities and attract visitors from around the world. These small businesses are

particularly vulnerable to impacts from large infrastructure projects that disrupt the social cohesion and foot-level traffic that enables their businesses to succeed.

The new Draft EIS should include a full economic analysis of the impacts, including the loss of jobs, and Sound Transit should propose innovative and comprehensive mitigation to address those impacts. Measures that should be proposed include a marketing plan with global reach to ensure people continue to visit downtown Seattle during the 10+ years of construction; a business attraction and retention plan so national and foreign direct investment in Seattle businesses continues; maintaining pedestrian corridors that are legible and well-lit for a quality visitor experience; and funding for business districts and community organizations to provide direct and indirect economic development support.

The economic analysis should also include the loss of development opportunities and mitigation should be proposed to address those impacts. Properties surrounded by long-term road closures cannot be developed during construction, which will impact the owner's economic investment and tax revenue to local governments and the state. Loss of development opportunities will also reduce revenue to affordable housing from the City of Seattle's Mandatory Housing Affordability program. If the City of Seattle is not able to fund the construction of affordable housing, downtown businesses will not be able to attract employees and thus contribute to our region's economy.

The economic analysis should also consider reduced attendance at events that will adversely impact the collection of Admission Tax, which is one of the significant funding sources for arts and culture in the city of Seattle, which will further impact these organizations.

Public safety and security

The numerous street and sidewalk closures, large construction sites and staging areas across downtown will have the effect of isolating areas of the urban environment, disrupting the normal flow of traffic and pedestrians. This will create pockets of dead zones that pedestrians will avoid because they perceive them as unsafe, leading to economic losses for ground-floor businesses that rely on foot traffic.

The new Draft EIS should identify the concurrent closures of traffic lanes, sidewalks, and bicycle lanes and analyze their impact on a pedestrian's and vehicle's ability to travel through the construction areas throughout downtown. Mitigation to address these impacts should be identified and include actions such as adopting CPTED practices and hiring additional security personnel.

Property acquisition

The concurrent construction of six new stations will require the acquisition of large parcels of land throughout downtown Seattle, disrupting the urban fabric, neighborhood cohesion and social resources that are made up by the businesses, arts and culture venues, the Convention Center, Pike Place Market, and other regional destinations in downtown Seattle.

The new Draft EIS should identify how Sound Transit will dispose of property it acquires or enter into joint development agreements so that where feasible, new transit-oriented development is complete when light rail service begins. If property disposition cannot be completed before the project opens, the new draft EIS should identify mitigation strategies that minimize the impact of vacant properties, such as temporary activation. Mitigation considered should also include leasing property for construction staging rather than acquisition so the private sector is able to develop the property as soon as it is no longer needed for staging.

The Capitol Hill and U-District stations are both examples where transit-oriented development was not complete until several years after station opening, which extended the duration of impacts to the community.

Construction approach

To be considered adequate, the new Draft EIS should describe the potential construction approaches for each station and disclose the impacts – transportation, noise, vibration, economic, safety, etc. – of each approach assuming concurrent construction at the other downtown stations.

Repeating the 2022 WSBLE Draft EIS approach, which generically described construction approaches, will not adequately disclose the extent of impacts to the station areas and downtown. It will also fail to capture the full extent of concurrent impacts on downtown, especially considering there are likely only one or two viable construction options for each station. For example, the 2022 WSBLE Draft EIS identified sequential excavation as the only likely construction approach for the Westlake Station, but did not identify the impacts associated with that approach or mitigation.

While we understand the construction approach will evolve during the final design and after a contractor is selected, it is inadequate to fail to disclose possible impacts because Sound Transit wants flexibility to leave means and methods decisions to the contractor. Given the complexity and scale of this project and to improve the likelihood of competitive bids, there will likely be multiple contractors working concurrently throughout downtown. It is the responsibility of Sound Transit to set standards and requirements for contractors that address impacts on the surrounding community. An adequate Draft EIS must identify, disclose, and propose strategies to avoid, minimize, or mitigate impacts that will be incorporated into standards and requirements contractors will be required to meet.

Noise and vibration

Downtown Seattle is home to 106,000 residents, multiple unique arts and culture organizations, and research facilities that are sensitive receivers for noise and vibration impacts. The new Draft EIS should list the sensitive receivers along the corridors, identify the impacts to these sensitive receivers, and propose how noise and vibration variances along the corridor during construction will be used so the public can comment on possible impacts. Additionally, the new Draft EIS

should identify the noise and vibration thresholds specific to the actual affected venues and existing conditions that will be used to define the design specifications and standards for operations. Mitigation plans that reduce and avoid impacts at the source, like the floating slabs used for UW labs, should also be included.

Noise and vibrations will be felt in areas outside the immediate station area. This analysis should also consider the impacts of station construction happening concurrently within close proximity to each, such as the Denny and South Lake Union stations.

Public and private utilities

Given the 10+ years of construction at each station location, it may be more cost effective and efficient for Sound Transit to proactively work with utility providers to identify and implement mitigation measures that can be put in place at the start of utility relocation where significant transportation and other impacts will be realized even before station excavation begins.

However, Sound Transit does not disclose the impacts of private and public utility relocation that is necessary for the BLE project to be constructed, which limits effective coordination and leaves the public unable to comment on the potential impacts of this work. For example, the 2022 WSBLE Draft EIS stated that, "Additional road or lane closures may be needed for utility relocation, which would be determined during final design in coordination with the utility owner."

The new BLE Draft EIS will be inadequate if it does not analyze impacts of utility relocations that will close travel lanes, sidewalks, or bicycle lanes for periods greater than six months and then propose mitigation measures, including those that could also address impacts of light rail construction. Sound Transit should use this information to proactively coordinate with utility providers.

Access to social and health services

Downtown Seattle is home to the largest number of social service and public health providers in the region serving a mix of socioeconomic groups and people with limited mobility. The concurrent construction of six stations across downtown will impact access to buildings, change transit routes, and close sidewalks potentially impeding access to these services, especially in the Pioneer Square and Chinatown-International District neighborhoods.

For example, the preferred location of the CID station is near the Seattle Indian Center, the Chinese Information and Service Center, Keiro Northwest, International Community Health Services' International District Medical and Dental Clinic, and the International District/Chinatown Community Center which serve thousands of seniors and families. The new Draft EIS should identify these potential impacts and propose solutions that work for a wide range of people accessing these services.

Assessing and mitigating community impacts

The Chinatown-International District is a neighborhood with a rich immigrant history, culturally significant institutions, and a diverse mix of residents and small businesses, primarily people of color. In 2023, the National Trust for Historic Preservation identified Chinatown-International District as one of most endangered historic neighborhoods in the nation, at risk for displacement from infrastructure projects.

The district has been a center for Asian Americans for decades and is a hub for small businesses, community groups, and residents. The loss of small family-owned businesses and residents due to displacement would be irreplaceable for this community. Sound Transit must acknowledge the historic racism that has impacted the health and well-being of this neighborhood and center community needs. Given the unique and historic nature of this neighborhood, as part of the new Draft EIS, Sound Transit must conduct a community impacts assessment and suitably mitigate impacts to the community through a community development fund.

Disruptions to existing light rail service

The new downtown Seattle transit tunnel will add the required capacity to extend light rail to Everett and Tacoma by moving the 1 Line service into the new tunnel. It will also provide a transfer point between the 1, 2 and 3 Lines at the existing Westlake and Pioneer Square stations.

The new Draft EIS should analyze the impacts on existing service when moving the existing 1 Line to the new tunnel and connecting the existing Westlake and Pioneer Square stations to the new tunnel and identify the appropriate mitigation. It is not reasonable to assume these operational changes will have no impact on existing service and the thousands of riders using the system daily when BLE service begins. These impacts will require substantial mitigation on the scale of what was necessary when the Alaskan Way Viaduct was closed prior to the opening of the SR 99 tunnel.

Transportation analysis focus areas

In addition to the station-specific concerns identified in Attachment 2, the following provides general areas of concern that are applicable to all station locations. Based on the concurrent construction of six stations along the three-mile alignment, there will be significant impacts to pedestrian and vehicle mobility through the downtown area.

The new Draft EIS should include a comprehensive traffic analysis assessing these impacts and identification of appropriate mitigation measures. Mitigation measures should be defined based on a coordinated and collaborative process with area businesses and residents. It is vital during the post-COVID period as downtown Seattle looks to regain its position locally, nationally, and internationally that construction does not act as a barrier for employees, residents, and visitors. The analysis should consider the following:

- Traffic volumes utilized in the analysis should consider **return to work policies** to be implemented in January 2025. This will result in increases across all modes of transportation, particularly pedestrian and vehicle traffic throughout downtown.
- Traffic analysis methodology should consider **measures of effectiveness** such as travel time and corridor operations, not just individualized intersection level of service.
- The traffic analyses should evaluate key corridors and include all street closures or modifications in conjunction with the concurrent station construction. A time period should be identified that reflects the maximum period of constraints. Given the street closures anticipated, shifts in traffic are expected to overburden parallel facilities. Looking at corridor operations that take into consideration future construction projects that will overlap with BLE and shifts in all modes will provide a better representation of future operations in the area and inform mitigation opportunities.
- Construction laydown sites and traffic routes should be identified to assess impacts on the transportation system. If design-build is the preferred construction approach, it can mean postponing important means and methods decisions until contractors are hired. However, the potential magnitude of the impacts of the BLE necessitates earlier decisions regarding construction laydown sites, construction routes, and closures of roads and intersections. Meaningful analysis of the construction impacts cannot otherwise occur.
- Analysis scenarios should consider **event and non-event conditions**. Events occurring in the Seattle Center area as well as the Chinatown-International District, SODO, and stadium area have a significant impact on transit, freight, and cars.
- While construction means and methods may not be known, the analysis should consider reasonable construction alternatives for purposes of conducting the analysis.
- An assessment regarding transit (e.g. buses, light rail, BRT, streetcar,) impacts should be included in the scope. This includes an assessment of impacts to transit travel times, access to stop locations, and general circulation. With the anticipated closures, route redundancy will be limited.
- Impacts to parking need to be assessed for each station area as well as downtown, which already is perceived as a difficult place to find parking. Sound Transit should make every effort to sustain on-street parking and access to surface parking lots and garages. The analysis should identify the number of on-street spaces taken off-line as well as any impact to off-street parking facilities. It should also identify mitigation to address impacts to access and wayfinding and public perception of lack of parking availability downtown.
- Document existing shared mobility (i.e. scooter) parking areas impacted by construction and identify alternative locations.

Successful mitigation practices

When proposing mitigation in the new Draft EIS, Sound Transit should consider recent downtown projects that committed to and implemented successful mitigation practices, including:

- Climate Pledge Arena: This project is a good example of proactive community engagement during construction. Not only did the owner do the usual and expected engagement (24-hour hotline, website, monthly meetings), they were actively walking around the site with community members, proactively holding coffee dates/open houses to hear concerns and regularly documenting how they were addressing concerns that had arisen.
- Alaskan Way Viaduct Replacement/SR 99 Bored Tunnel: WSDOT mitigated the loss of waterfront public parking by making short-term parking available to encourage visits to local restaurants and ground-floor retail, funding a waterfront shuttle (which was continued through the Elliott Bay Seawall and waterfront park construction), and investing in marketing to inform the public the waterfront was open and accessible during construction.
- Elliott Bay Seawall Project: The City of Seattle and waterfront businesses mutually agreed the best way to rebuild the seawall was for the businesses to close for a set period, for which they were compensated. This allowed construction to proceed more efficiently without having to maintain 24/7 access to businesses, loading docks, etc. While this may not be appropriate in every situation, it demonstrates the kind of creative thinking that can meet the needs of the community and Sound Transit.
- Waterfront Seattle: The reconstruction of Seattle's waterfront included investments in community organizations to hire experts to coordinate construction with the adjacent businesses, functions typically fulfilled by agency staff. This resulted in a more efficient and effective working relationship through proactive problem-solving that kept construction on schedule and addressed impacts on businesses in real-time.
- Convention Center Expansion: As part of the property purchase agreement, the Seattle Convention Center made investments in the community, including funding for affordable housing, parks and open spaces, improvements to Pike and Pine streets, bicycle infrastructure, a study of lidding I-5 and other community projects.

Attachment 2 - Station-Specific Comments

The following comments focus primarily on the construction-related impacts of the preferred alternative, however, we acknowledge that there continues to be disagreements about some of proposed station locations.

We recognize the regional importance of the BLE project and, given its duration, scope and magnitude of the construction activities, the high likelihood that the project will result in significant impacts to downtown Seattle from the Chinatown-International District to Seattle Center during the construction period. This is due to the activities at each station, but more importantly, the concurrent construction of all stations.

Previous analyses presented by Sound Transit in the 2022 WSBLE Draft EIS (*West Seattle and Ballard Link Extensions DEIS: Transportation Technical Report Appendix N.1*, January 2022), did not evaluate the concurrent impacts nor did it identify or present specific mitigation measures during the concurrent station construction that would help offset or minimize the construction impacts. Also, in assessing the construction related impacts of the BLE project previously, there was reference to the impacts as temporary conditions.

Seattle Municipal Code section **23.42.040 - Intermittent, temporary, and interim uses,** Section F specifically addresses Light Rail Transit Facility Construction. Section F, Subsection D states the requirements related to Parking and Traffic.

1) Measures addressing parking and traffic impacts associated with truck haul routes, truck loading and off-loading facilities, parking supply displaced by construction activity, and temporary construction-worker parking, including measures to reduce demand for parking by construction employees, must be included and must be appropriate to the temporary nature of the use.
2) Temporary parking facilities provided for construction workers need not satisfy the parking requirements of the underlying zone or the parking space standards of Section 23.54.030.

While the requirements specifically speak to haul route impacts, the impacts associated with long-term street closures should be considered. As an example, for the construction of the Seattle Convention Center loading dock under Olive Way, a temporary roadway was required to maintain vehicle connections to I-5. The same mitigation requirements should be applied to this project.

When considering the concurrent station construction, impacts to the following areas are anticipated and should be identified in the new Draft EIS along with proposed mitigation strategies:

- Public transit stops and routing
- Private employer-sponsored programs
- Pedestrian circulation and safety
- Impacts to bicycle facilities and general mobility
- Vehicle congestion and mobility
- Impacts to loading docks and parking facilities necessary to maintain the functionality of buildings and supporting uses
- General impacts of truck traffic related to concurrent excavation of the stations
- Coordination of utility and early work by others (Seattle, utility franchises, etc.)

Road and sidewalk closures will impact multiple modes concurrently and should be considered in the analysis.

The following identifies concerns – transportation and other issues – specific to each station that should be analyzed with specific mitigation proposed in a comprehensive analysis of the concurrent construction impacts.

Seattle Center Station

Transportation

- Disclose the impacts to north/south and east/west vehicle mobility due to the sequence and duration of construction along Republican Street.
- Identify impacts to bike facilities and mitigation measures.
- Over 40 arts and culture venues exist in the Seattle Center area as well as Climate Pledge Arena and Memorial Stadium resulting in frequent elevated traffic volumes. Vehicle mobility under these conditions should be assessed considering a reduction in roadway capacity, including impacts on visitors and employees of the venues as well as traffic traveling through the area.
- Patrons visiting the various venues park throughout the Uptown/Seattle Center area. The pedestrian routes from parking areas to the venues could be severed by the closure of Republican. Alternative pedestrian routes need to be defined and mitigation to improve the routes (signage, lighting, civil improvements) need to be identified.
- Multiple transit routes either cross Republican Street or travel along Republican Street within the closure area as documented in the 2022 WSBLE Draft EIS. These impacts should be assessed as improvements are likely required at adjacent facilities to provide equivalent speed and reliability of the existing service. These solutions may impact capacity for general purpose traffic in the area.
- Impacts and mitigation measures need to be identified to address impacts to on-street loading zones and access to off-street loading zones and parking accessed from Republican. These impacts need to be disclosed, and mitigation measures identified.

- There are numerous event venues that will be impacted by haul routes and deliveries during construction. These routes and volumes should be reasonably estimated and impacts disclosed.
- Impacts to the local parking supply and mitigation should be identified based on increases in construction workforce parking.
- Impacts and mitigation measures should be identified to address impacts on back-of-house and production loading zones for all Seattle Center organizations, including the Space Needle, MoPop, Climate Pledge Arena, KEXP, Seattle Rep and McCaw Hall.

Public safety

People attending sports and cultural events at Seattle Center rely on private and public parking on the streets surrounding the preferred Seattle Center station on Republican Street. In addition, the area adjacent to the east end of the construction zone at Queen Anne Avenue and Republican is home to a transit stop with high-frequency routes and street-level retail that relies on foot traffic.

The construction and staging areas analyzed in the Draft EIS should identify impacts to access to the parking and transit facilities in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid. These impacts should also be analyzed in the context of concurrent and similar impacts at the South Lake Union station where Seattle Center visitors also park or take transit.

Cumulative impacts

For the Seattle Center station, the following projects should be included in the cumulative impacts: Revive I-5; Seattle Transportation Levy Projects; and major private property developments.

South Lake Union Station

Transportation

- Extended closure of Harrison Street will significantly impact vehicle mobility and access to SR 99. Full or partial closure of Harrison Street will have a broader impact on the South Lake Union transportation system. Anticipated shifts in traffic within the South Lake Union area need to be evaluated, disclosed, and mitigated.
- Identify impacts to bike facilities and mitigation measures.
- Multiple transit routes utilize the SR 99 northbound on-ramp including King County Metro's Rapid Ride E Line. The impacts to these routes during construction should be evaluated and disclosed. Mitigation measures need to be identified as well as the secondary impacts to general purpose mobility resulting from the identified improvements. Design feasibility of these alternative routes should be reviewed to confirm buses can utilize the routes or if secondary intersection or roadway improvements are needed.
- Local employers operate private shuttles in this area. Sound Transit should coordinate with local employers to identify stop locations and routes, assess impacts, and identify mitigation strategies in coordination with the employers.

- Identify local freight routes impacted by construction related road closures and identify mitigation measures
- Identify on-street and off-street loading areas and parking access points impacted by construction related closures.

Public safety

The area around the South Lake Union station is home to high-frequency transit routes that are utilized by Seattle Center visitors and major employers in the surrounding area, such as UW Medicine, Meta, Apple, and Amazon. The construction and staging areas analyzed in the Draft EIS should identify impacts to access to the transit facilities in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid.

These impacts also need to be analyzed in the context of concurrent and similar impacts at the Seattle Center station where Seattle Center visitors also park or take transit.

Cumulative impacts

For the South Lake Union station, the following projects should be included in the cumulative impacts: Memorial Stadium redevelopment; Seattle Transportation Levy Projects; Revive I-5; and major private property developments.

Public and private utilities

The new Draft EIS will be inadequate if it does not analyze the impacts of utility relocations that will close travel lanes, sidewalks, or bicycle lanes for periods greater than six months. Construction of the South Lake Union station at the preferred location requires the re-routing of Seattle City Light's network system along John Street and Eighth Avenue and Sound Transit estimates early utility work could take as long as three years.

Denny Station

Transportation

- The construction of the station will take the South Lake Union streetcar off-line for many years; impacts and mitigation of this action need to be identified.
- Evaluate and disclose the impacts due to the anticipated closure of Westlake Avenue and John Street as well as the impacts to Westlake Avenue at the Denny Way intersection.
- North/south vehicle capacity will be impacted due to the closure of Harrison Street as well as the concurrent closure and/or reduction in capacity along Westlake Avenue North. The timelines for these closures should be identified. If a schedule cannot be defined an assumption should be made such that a mitigation plan can be identified in the new Draft EIS. If the construction schedule differs in the future the mitigation measures identified can be reviewed and revised.

- North/south transit capacity and speed and reliability need to be evaluated due to the concurrent construction of the South Lake Union and Westlake stations. Mitigation measures should be identified with an assessment of secondary impacts to general purpose mobility.
- Due to the proximity and anticipated schedule of street closures at the South Lake Union station, the broader circulation impacts to transit and general purpose traffic needs to be assessed. Specific mitigation needs to be identified to offset the impacts of the simultaneous road closures.
- Local employers operate private shuttles in this area. Sound Transit should coordinate with local employers to identify stop locations and routes, assess impacts, and identify mitigation strategies in coordination with the employers.
- Identify impacts to bike facilities and mitigation measures.
- Identify local freight routes impacted by construction related road closures and identify mitigation measures.
- Identify on-street and off-street loading areas and parking access points impacted by construction related closures.

Public safety

The area around the Denny station is a high density residential and commercial area with street-level retail that relies on foot traffic. In addition, Denny Park is one of the limited open spaces in the neighborhood and has experienced recent public safety challenges.

The construction and staging areas analyzed in the Draft EIS should identify impacts to public safety in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid. Mitigation measures should be included that maintains Denny Park as an open and welcoming space for neighborhood residents to enjoy during construction.

Cumulative impacts

For the Denny station, the following projects should be included in the cumulative impacts analysis: Revive I-5; Seattle Transportation Levy Projects; and major private property development.

Westlake Station

Transportation

- North/south and east/west vehicle mobility will be significantly impacted by the concurrent closures and reduction of capacity along Fourth and Fifth avenues and Pine and Pike streets. The timelines for these closures should be identified. If a schedule cannot be defined an assumption should be made such that a mitigation plan be developed. If the construction schedule differs in the future the mitigation measures identified can be reviewed and revised.
- Alternative corridors such as Sixth and Seventh avenues should be evaluated considering the construction-related closures and shifts in traffic that are anticipated.

- North/south transit capacity and speed and reliability need to be evaluated due to the concurrent impact to the roadways surrounding the station site. Mitigation measures should be identified with an assessment of secondary impacts to general purpose mobility.
- Pine and Pike streets are key pedestrian corridors linking the Convention Center, downtown retail core, Pike Place Market, and the waterfront. The connectivity for pedestrians through the construction zone should be reviewed and mitigation measures identified, including restoration of the recently completed Pike-Pine Corridor Renaissance investments. The mitigation should provide at least one continuous route for pedestrians between the Convention Center and Pike Place Market.
- Identify impacts to bike facilities and identify mitigation measures such as impacts to the Pine and Pike Street and Fourth Avenue Bicycle facilities.
- Identify local freight routes impacted by construction related road closures and identify mitigation measures.
- Major investments are anticipated at the Seattle Monorail's Westlake station. The scope and timing of these improvements need to be coordinated with the construction activity.
- Identify on-street and off-street loading areas and parking access points impacted by construction related closures, including customer and product access to retail destinations around the station area such as Nordstrom's flagship store, Westlake Mall, and Pacific Place.

Public safety

The Westlake station area serves as the heart of the retail and commercial district and there are high pedestrian, transit – including Sound Transit's existing station – and traffic volumes utilizing Pike and Pine Street to connect to regional destinations such as the Convention Center, Pike Place Market, and shopping, hotels and restaurants.

The construction and staging areas analyzed in the Draft EIS should identify impacts to access to the transit and pedestrian facilities in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid. This includes a continuous walkway along Pike and Pine streets, and Fourth and Fifth avenues, during construction.

Cumulative impacts

For the Westlake station, the following projects should be included in the cumulative impacts analysis: Revive I-5; the City of Seattle's Westlake Park Reimagined; Seattle Transportation Levy Projects; and major private property developments.

Midtown Station

Transportation

- North/south and east/west vehicle mobility will be significantly impacted by the potential concurrent closures and reduction of capacity along 4th Ave, Yesler, and James St. The timelines for these closures should be identified. If a schedule cannot be defined an assumption should be made such that a mitigation plan be developed. If the construction schedule differs in the future the mitigation measures identified can be reviewed.
- Alternative corridors providing access to I-5 and the First Hill area, Cherry Street, and Marion Street should be evaluated.
- Multiple transit routes will be impacted by the station construction. Transit capacity and speed and reliability need to be evaluated considering the overall rerouting created by concurrent station construction and associated roadway closures. Mitigation measures should be identified with an assessment of secondary impacts to general purpose mobility.
- Identify impacts to bike facilities and mitigation measures.
- Identify local freight routes impacted by construction related road closures and identify mitigation measures.
- Identify on-street and off-street loading areas and parking access points impacted by construction related closures.
- Document potential haul routes, truck trips, and timing. The additional traffic needs to be evaluated along with the likely shifts in traffic due to anticipated road closures.

Public safety

The Midtown Station area is home to a low-income population and services that they and others from around the region rely on. The construction and staging areas analyzed in the Draft EIS should identify impacts to access to these services in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid.

Cumulative impacts

For the Midtown station, the following projects should be included in the cumulative impacts analysis: Revive I-5; Jackson Street Hub; 4th Avenue Viaduct Replacement; Second Avenue Extension Rehabilitation; WOSCA site redevelopment; King County's Civic Campus; Seattle Transportation Levy Projects; and major private property developments, such as the full block between Third and Fourth avenues and James and Cherry streets.

Chinatown-International District Station

Transportation

- North/south and east/west vehicle mobility will be significantly impacted by the potential concurrent closures and reduction of capacity along Sixth Avenue and Airport Road. The

timelines for these closures should be identified. If a schedule cannot be defined an assumption should be made such that a mitigation plan be developed. If the construction schedule differs in the future the mitigation measures identified can be reviewed and revised.

- Multiple transit routes will be impacted by the station construction. Transit capacity and speed and reliability need to be evaluated considering the overall rerouting created by concurrent station construction and associated roadway closures.
- Identify impacts to bike facilities and mitigation measures
- Identify local freight routes impacted by construction related road closures and identify mitigation measures
- Identify on-street and off-street loading areas and parking access points impacted by construction related closures.
- Document potential haul routes, truck trips, and timing. The additional traffic needs to be evaluated along with the likely shifts in traffic due to the anticipated road closures. This analysis should include a review of the adequacy of the facilities to be used by the trucks.

Public Safety

The Chinatown-International District is disproportionately affected by public safety incidents compared to the rest of downtown. A dead zone surrounding the preferred station location, which also experiences high volumes of pedestrian traffic going to and from events at Lumen Field, will create more areas where pedestrians will feel unsafe.

The construction and staging areas analyzed in the Draft EIS should identify impacts to access to services, transit facilities, and the sports stadiums in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid.

Cumulative impacts

For the Chinatown-International District station, the following projects should be included in the cumulative impacts analysis: Stadium and SODO station construction; interim operations after West Seattle complete; U.S. Coast Guard Base expansion on Terminal 46; Seattle Transportation Levy Projects; Fourth Avenue viaduct replacement; Second Avenue extension rehabilitation and major private property developments.

Public and private utilities

The new BLE Draft EIS will be inadequate if it does not analyze the impacts of utility relocations that will close travel lanes, sidewalks, or bicycle lanes for periods greater than six months. The preferred station location at Dearborn Street may require the relocation of a gas line if it is not able to be protected in place. This would necessitate longer traffic lanes or street closures.

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December 6, 2024

VIA EMAIL

Ballard Link Extension, c/o Lauren Swift
Sound Transit
401 South Jackson Street
Seattle, WA 98104
blescoping@soundtransit.org

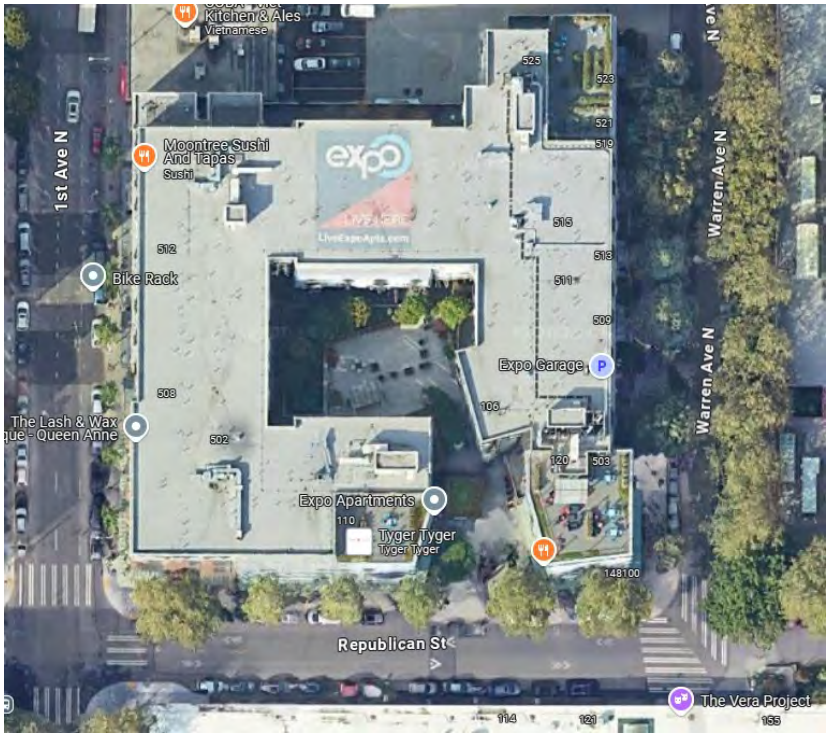
Re: Ballard Link Extension

Scoping of New NEPA Draft EIS and Supplemental SEPA Draft EIS

Dear Ms. Swift:

We represent Essex Queen Anne, LLC ("Essex"), the owner of the property at 118 Republican Street ("Property"), on the corner of Republican Street and Warren Avenue North. This letter provides Essex's comments on the scoping of Ballard Link Extension Draft EIS ("BLE Draft EIS").

The Property hosts the Expo Apartments complex, which includes 275 residential units and 30,000 square feet of ground-floor retail uses directly adjacent to the Seattle Center's Northwest Rooms and August Wilson Way. Here is an aerial image of the Property:



The Expo Apartments' garage is accessed from Warren Avenue North. Essex understands that the Preferred Alternative location for the future Seattle Center Station has been moved west from an earlier proposed location immediately south of the Property, at least partially in response to the concerns of community members. We appreciate Sound Transit's ("ST's") responsiveness to the community's legitimate concerns about the proposed station locations directly adjacent to the Seattle Center raised during the West Seattle Ballard Link Extension Draft EIS ("WSBLE DEIS") process. We hope this type of collaboration remains central throughout the BLE Draft EIS process.

To that end, we request that Sound Transit carry forward the comments from our April 2022 comment letter on the WSBLE DEIS. Beyond those comments, we respectfully submit the following comments to the NEPA scoping phase of the BLE Project.

Project Purpose and Need

Regarding the Project's purpose, we are generally supportive of the following statements directly from ST's webpage for NEPA scoping of the Project:

- "Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development and multi-modal integration in a manner that is consistent with local land use plans and policies, including Sound Transit's Equitable Transit Oriented Development Policy (Sound Transit 2018) and Sustainability Plan (Sound Transit 2019)."
- "Encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections, consistent with Sound Transit's System Access Policy (Sound Transit 2013)."
- "Preserve and promote a healthy environment and economy by minimizing adverse impacts on the natural, built, and social environments through sustainable practices."

None of these purpose statements mention any aim to preserve existing housing, businesses, or non-motorized access to either existing use. We respectfully ask that either these purpose statements be amended to reflect a desire to preserve the viability of housing and businesses that already exist near the Station's location under each of the Alternatives or to include a new purpose statement that reads "Encourage the retention of existing housing and businesses near station areas through adequate consideration and mitigation of short- and long-term Project impacts on current residents, businesses, and employees."

We offer similarly qualified support for several statements regarding the need for the Project as they are listed on the ST Scoping webpage, specifically:

- "The region's residents and communities, including transit-dependent people, low-income people, and communities of color, need long-term regional mobility and multi-modal connectivity as called for in the Washington State Growth Management Act (Revised Code of Washington 36.70A.108)."

- Regional and local plans call for increased residential and/or employment density at and around high-capacity transit stations and increased options for multi-modal access. VISION 2050 has a goal for 65 percent of the region's population and 75 percent of the region's employment to occur in regional growth centers and within walking distance of transit.

Both of these statements could be interpreted as deemphasizing consideration of existing residents and businesses, which includes maintaining existing vehicular access for residents and businesses' employees, customers and deliveries, in favor of new development and/or multi-modal access. To be clear, we do not believe that ST intends for the Project to ignore the interests and concerns of those who already live and work near the Proposed Station Locations. ST would not have changed the Preferred Station Location if that were the case. However, the Project's current need statements do not reflect this pattern of consideration. To remedy this discrepancy, we ask that the BLE Draft EIS include a need statement to the effect that "All of the Project goals listed here should be pursued with the understanding that preference should be given to retention of existing housing and business, including existing vehicular access for residents, employees, customers and deliveries."

Alternatives to be Studied

We support the adoption of the Preferred Alternative for the Downtown segment of the BLE Project as shown in NEPA scoping documents, including the current Preferred Station Location for the Seattle Center Station.

As the Project proceeds, we strongly urge ST to study only those alternatives that avoid locating the Seattle Center station directly adjacent to the Seattle Center and Expo. Correspondingly, we ask that any Alternatives studied in the BLE Draft EIS include station locations that promote the technical feasibility of locating the Seattle Center Station at the Preferred Alternative Station Location. To that end, we ask ST to exclude the study of any locations for the proposed Denny Station, which would require locating the Seattle Center Station adjacent to the Property.

Potential Topics to Study in the EIS

Construction impacts should be given detailed treatment because of the anticipated duration of construction and its disruption of access. As a general comment, the BLE Draft EIS should be based on construction plans that are sufficiently definite to allow a meaningful assessment of potential impacts. The WSBLE DEIS considered plans that were at less than 5% completion. Such a level is too preliminary to allow a meaningful evaluation of potential impacts. The new DEIS should be based on much more detailed information than that used in the WSBLE DEIS. This more detailed information should include, among other things:

- Depictions of horizontal and vertical control for each alignment alternative

- Information about actual construction methodology that allows one to determine noise, vibration, and earth movement impacts;

- Information on the scope of above-grade construction limits;
- Identification of proposed street closures and their respective durations;
- Identification of proposed pedestrian infrastructure
- Identification of proposed location and duration of construction staging; and
- Complete information on the duration and sequencing of construction activities, as needed for assessing the cumulative impacts of construction work on the urban environment.

In addition to addressing these concerns about the general level of informational detail considered by the BLE Draft EIS, the BLE Draft EIS should include study of potential impacts related to the following topics.

1. Acquisitions, displacement, and relocation – Besides considering direct Project impacts related to acquisitions, displacement, and relocation of current property owners and tenants, the BLE DEIS should consider the secondary economic effects of any proposed Alternatives.

2. Construction – The BLE Draft EIS must adequately analyze the Project's construction impacts, particularly those related to noise, vibration, light, glare, and dust. The BLE Draft EIS should identify, analyze, and compare such impacts as they apply to possible construction methods, including underground boring and cut-and-cover tunneling techniques. The BLE Draft EIS should include performance standards and specific mitigation measures to ensure the Project meets them. Such mitigation measures could include, for example, sound level monitoring at residences, time limitations on construction that may impact sensitive residential uses, installation of sound barriers, limits on using specific equipment and construction methods to reduce vibration, and pre- and post-construction evaluation of property conditions. We urge ST to provide performance standards at the Draft EIS phase of review to allow for the full development of mitigation measures as early as possible.

3. Future Phased Review - Alternatively, if ST cannot provide information sufficiently detailed to determine such performance standards, the Draft EIS should include provisions to ensure future phased review of the Project. It is unclear if ST considers the BLE Draft EIS a project action EIS or an early programmatic EIS that anticipates the need for future SEPA review. The BLE Draft EIS should include detailed information regarding all adverse impacts if it is the former. If the BLE Draft EIS is the latter, it should expressly state so.

4. Transportation and Neighborhood Accessibility – The BLE Draft EIS should provide complete information on the timing, duration, and location of possible street closures associated with the Project. Documents from the WSBLE DEIS indicated that some

neighborhood streets might be closed for five years or longer. Such street closures can result in significant adverse impacts. Loss of access to on-site parking and loading facilities could force entire buildings to shut down in the short term. Long-term impediments to accessing homes and businesses will result in significant adverse impacts, particularly for buildings like Expo, where customer and loading access is critical to the survival of street-level retailers and restaurants. Similarly, maintaining continuous access to Expo's 329 on-site parking spaces is essential to serving Expo's residential and commercial tenants. Given the amount of environmental review that has already been conducted related to potential locations for the Seattle Center Station, it is reasonable, indeed critical, that the BLE Draft EIS include detailed information identifying potential significant adverse impacts related to neighborhood accessibility.

5. Land use – The BLE Draft EIS must adequately analyze and disclose the significant adverse short- and long-term impacts that the Project will have on current and potential future uses, including the residential and commercial uses in Expo, due to the lengthy and disruptive construction period as well as any potential future long-term reduction of vehicular and delivery access. Expo has 9 retail and restaurant tenants that contribute to the Uptown neighborhood's general vitality and comprise a substantial portion of the surrounding area's commercial uses. Failure to successfully study and mitigate the Project's impacts on these vital businesses could result in the businesses' permanent shuttering and accompanying COVID-style blight throughout the station area. Such a scenario would undermine the City's ability to achieve its land use goals and should thus be studied in the BLE Draft EIS. Study of the Project's land use impacts should include the identification of mitigation measures sufficient to reduce the impacts below significant levels.

Conclusion

We respectfully request that the BLE Draft EIS continue to study the Preferred Station Location and exclude the study of any Alternatives that would prevent the Seattle Center Station from being there. Additionally, we request that the BLE Draft EIS adequately disclose the Project's impacts in the Seattle Center vicinity to allow for full analysis of Alternatives and the earliest possible identification of potential mitigation measures. Expo's unique mix of residential and commercial uses makes it particularly sensitive to a variety of potential Project impacts. Along with its own distinct concerns, Essex shares many of those previously voiced by other neighborhood stakeholders, including the Uptown Alliance, the Seattle Center Foundation, and a host of arts organizations located within the Seattle Center. As such, Essex incorporates by reference the prior comments by these stakeholders that relate the preferred location of the Seattle Center Station, route alignment alternatives, and the need for study of Project impacts including, but not limited to, displacement, construction, economic effect, long-term neighborhood accessibility, land use, and early identification of measures to mitigate Project impacts.

Thank you for considering these comments.

Sincerely,

Courtney A. Kaylor

cc: Client

ICHS International Community HEALTH SERVICES
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December 8, 2024

Ballard Link Extension Scoping Comments
C/O Lauren Swift
Sound Transit
401 S Jackson St
Seattle, WA 98104

RE: Scope for the Draft Environmental Impact Statement for the Ballard Link Extension Project

Dear Ms. Swift

International Community Health Services (ICHS) is writing in regards to the scoping period for the Ballard Link Extension (BLE) issued by Sound Transit. We appreciate the opportunity to submit input on the scope of the environmental impact study for this project. Our comments here will be primarily focused on the project segment related to the Chinatown International District (CID) and Pioneer Square (PSQ).

ICHS supports expanded transportation opportunities for the CID and PSQ and is convinced of both the need for and benefit from a regional transit hub serving these neighborhoods. Achieving these goals, however, will require thoughtful and deliberate analysis through both environmental health and racial equity lenses. We ask Sound Transit to include the following three broad areas in their environmental analysis of the BLE project:

1. Use the positive aspects of 4th Avenue S station location to inform the analysis of potential alternatives, regardless of the final selection;
2. Do not consider 5th Avenue S as a station option; and
3. More study of connectivity opportunities between Dearborn St station and the existing CID station.

About International Community Health Services

Established in 1973, ICHS is a Federally Qualified Health Center (FQHC) that offers comprehensive, culturally and linguistically appropriate health and wellness services across the Puget Sound region. Deeply rooted in the Asian American, Native Hawaiian and other Pacific Islander (AANHPI) communities, ICHS offers medical, dental, behavioral health, nutrition, acupuncture, senior services, and enabling services at four full-service and seven satellite sites. We provide these services to everyone, regardless of an individual's insurance status or ability to pay.

Seattle's Chinatown International District (CID) is home to our flagship International District Medical and Dental Clinic (ID Clinic); assisted living facility Legacy House; and senior care Healthy Aging and Wellness Program

(HAWP). However, our physical locations stretch from Shoreline to Auburn, and over one in ten patients are from outside King County. We offer services, such as our Vision Clinic and acupuncture, only at our ID Clinic.

ICHS served over 31,000 patients in 2023, including 10,575 at ID Clinic, our largest site by patient volume. Approximately four out of every five patients are low-income (200% of the Federal Poverty Level), 77% identify as Black, Indigenous, and People of Color (BIPOC), 66% of whom identify as AANHPI. About 20% of patients are seniors over age 65, and 20% of our patients are on Medicare or dual-eligible for Medicare and Medicaid. Linguistic and cultural competence are at the core of ICHS services.

Elder care is a significant business line, and the CID is home to our suite of senior service. ICHS operates senior programs which include assisted living, an adult day health center, a congregate meal program, and a Medicaid/Medicare Program of All-Inclusive Care for the Elderly (PACE) — all programs which provide a continuum of care for seniors age 65 and older. PACE is targeted for the frailest seniors who qualify for nursing home care to help them stay at home or in the community through comprehensive health, socialization, transportation and home care services from ICHS. Both HAWP and PACE operate out of Legacy House in the CID, anchoring our senior care and the elders we serve in this neighborhood.

Reviewing Our Comments for the 2022 West Seattle-Ballard Link Extension Draft Environmental Impact Statement

ICHS raised a number of questions and concerns in the 2022 West Seattle-Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS). To the extent that Sound Transit has already addressed them in the intervening years, ICHS appreciates this work. Our 2022 DEIS comments are summarized here.

The CID has historically shouldered inequitable burdens from major capital projects, including the I-5 overpass, Kingdome, and First Hill Streetcar, which ICHS believed were not adequately addressed in the DEIS. The long list of such laws and projects led us to believe Sound Transit must do more than stated in the DIES to prevent history from repeating itself. ICHS raised concerns that the full scope of likely impacts to the CID from the 5th Avenue alternatives were not fully addressed. We believed that the DEIS did not adequately account for how the 5th Avenue alternatives could disrupt the neighborhood beyond the projected business displacements. We also worried that temporary King County Metro relocations had the potential to disrupt ICHS business operations and patient services. Other concerns included that surface noise and visual assessments were not conducted for the CID segment in the DEIS. Finally, during the 2022 DEIS, the CID was in the midst of two public health crises: COVID-19 and anti-Asian racism. Both have tested the neighborhood's resiliency and neither were considered when the DEIS was drafted.

Scope of the BLE DEIS

ICHS understands that Sound Transit is soliciting feedback on three areas: project purpose and need, alternatives, and potential topics to be studied in the BLE Draft Environmental Impact

Statement (DEIS). We agree in principle with Sound Transit's stated project purpose and need, as we support expanding regional mass transit and equitable access to transportation. Our comments here focus on the alternatives and potential topics to be studied in the EIS and potential topics for study in the DEIS.

Alternatives to be Studied in the DEIS

ICHS has previously expressed concerns about Sound Transit's preferred alternative of Dearborn Street and Midtown/James Street stations (formerly "South of CID" and "North of CID" stations, respectively) and a preference for a 4th Avenue shallower station. Regardless of which alignment Sound Transit ultimately chooses, there are a number of factors the agency should consider to inform their final station selection.

Sound Transit recently completed further studies on the 4th Avenue shallower alignment. This alternative has been found to be a costly and long-lasting construction project with more logistical complications than are believed to exist for Dearborn Street or 5th Avenue shallow diagonal alternatives. The agency also found options for reducing time, cost, and impact to varying degrees and in varying combinations. Sound Transit should continue to study these options for 4th Avenue shallower. We understand the reasons Sound Transit believes 4th Avenue shallower to be unbuildable, even if we do not entirely agree with how these conclusions were drawn.

The 4th Avenue station had significant support from across the CID and PSQ. Nonprofits, businesses, family associations, community development authorities, and individual residents have expressed their support for this station for years. This is in large part due to the potential for regional connectivity and easier access to all forms of transit. Even if it is not selected as the final station location, fully understanding the appeal of this alternative will still inform Sound Transit's design and construction of the one it does select. **We request that Sound Transit continue to study 4th Avenue to look for opportunities to improve construction duration drivers, and to apply as much as possible the benefits of 4th Avenue to the final selected station.**

The 5th Avenue shallow diagonal alignment remains unbuildable. The same concerns raised by the CID community over the last several years still remain. Chief among them is that Sound Transit has not, and perhaps cannot, find ways to limit the station's construction footprint in the heart of the neighborhood. As currently proposed, the station would sit between 5th and 6th Avenues, and Weller and King Streets. There is simply no way that construction of this station and tunnel would not result in significant disruption to CID residents, businesses, and visitors.

More recently the neighborhood has suffered under the twin epidemics of COVID-19 and anti-Asian violence. They combined in the worst possible way, and the neighborhood still feels the effects of the anti-Asian xenophobia that was used to justify responses to the pandemic. A multi-year major construction project in the heart of the CID that would displace businesses and residents is completely unacceptable if the neighborhood is to survive. **ICHS strongly urges Sound Transit not to move forward with 5th Avenue alternatives**, but requests that the agency consider applying any lessons or positive effects anticipated to the final station location.

ICHS still has concerns about the Dearborn Street station. Chief among these are accessibility and connectivity. However, we recognize that Sound Transit selected Dearborn St. station as the preferred alternative, and want to work with the agency to strengthen the station as much as possible so that it provides the greatest benefit to the CID. Part of the BLE project's purpose is to "expand mobility for the corridor and the region's residents." This cannot be accomplished without maximizing accessibility to the Dearborn Street station by CID residents and transit users making connections from the existing CID station. Addressing connectivity concerns would alleviate many other challenges associated with Dearborn St. station. Solutions such as an underground pedestrian tunnel connecting the current CID station with the Dearborn Street station, movable walkways above or underground between the stations, and other more easily accessible pedestrian connections between the two stations would significantly improve accessibility and connectivity for neighborhood residents and riders. **ICHS requests that Sound Transit study ways to improve connectivity between the existing CID station and the Dearborn Street station**.

Potential Topics to be Studied in the DEIS

ICHS urges Sound Transit to include the topics listed above regarding the 2022 WSBLE DEIS to be included for analysis in the forthcoming BLE DEIS. We also ask that the agency consider the following issues and questions in their analysis.

Permitting approvals: Sound Transit is not the only agency that will be involved in station and tunnel construction. Any construction of new station(s) and tunnels will require coordination of right-of-way, construction, and other permits, with needs evolving over time. **Sound Transit must have a comprehensive plan for how it and other agencies will make permitting decisions, and there must be a place for community involvement in that decision-making process**. For example, haul road and traffic reroutes for the Dearborn Street station could have very concrete impacts to the CID, even if the station itself does not extend north of Dearborn Street.

Noise and vibration analysis: In the 2022 DEIS, ICHS urged Sound Transit to conduct surface noise and vibration analyses for the CID, even though the neighborhood's zoning technically allowed for the environmental review to proceed without it. We maintain that this perspective allows Sound Transit to avoid responsibility for impacts to the community in opposition to the agency's aims with the Racial Equity Tool (RET). **Sound Transit must conduct noise and vibration analysis in the CID for all alternatives being studied**. To not conduct an analysis because the agency has the option to do so, but is not legally required, would not allow it to "critically examine whom a decision will benefit or burden, identify potential unintended consequences and make decision-makers aware of these potential outcomes in advance."

Sound Transit acknowledges in its RET analysis of the BLE CID additional study results and South Downtown Hub progress presentation to the Sound Transit System Expansion Committee on November 14, 2024 that there are a "multitude of past harms inflicted on the community from past infrastructure projects and policies that have ongoing effects today," and that the community desires to "collectively address remaining questions, minimize potential impacts and maximize

community benefits, whether as part of design, through mitigation approaches, or as part of broader partnerships." Not conducting environmental studies such as noise and vibration impacts merely because they are not legally required dismisses the very conclusions Sound Transit reached in its RET work.

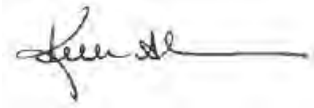
Cost comparisons: Regardless of which station alignment is ultimately selected, **Sound Transit should not continue to use 5th Avenue as the baseline for cost comparisons**. Although this station alignment is still being considered through the 5th Avenue Shallow Diagonal alternative, it was not selected as the preferred alternative nor for additional study. Estimated cost overruns attributed to the 4th Avenue station in particular are at least partly influenced by the delays in publishing a final EIS and selecting a final alternative. Without revised estimates for 5th Avenue and Dearborn Street that reflect current costs, accurate comparisons cannot be made. Until such updated cost data is available, 5th Avenue should not be used as the baseline.

DEIS comment period: **ICHS asks that Sound Transit issue an extended comment period for the DEIS.** This will ensure the community has sufficient time to consider the analysis and proposals the agency puts forward. In particular, because this will be the first DEIS opportunity for us to evaluate the full impact from the Dearborn Street station, extra time must be allowed.

Conclusion

ICHS urges Sound Transit to take these factors into consideration when determining what to study in the BLE DEIS to be issued in 2025. Please do not hesitate to contact us with any questions.

Sincerely,



Kelli Nomura
Chief Executive Officer
International Community Health Services

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Sound Transit Projects - Communications (1 Total)

Search Term

556347

Communication ID: 556347 - Keller Supply Company BLE Scoping Comment

Communication (11/5/2024)

Keller Supply Company BLE Scoping Comment

Hello,

Thank you for the opportunity to provide comment on the Ballard extension. I represent Keller Supply Company, which is located at 3209 17th Ave W. Keller Supply, the 19th largest private company headquartered in Washington State, has occupied the warehouse building on the property since approximately 1955, and the office building, used as its corporate national headquarters, since approximately 1974. Keller Supply employs approximately 100 people at this location. Our understanding is the current preferred alternative route for the Ballard link extension places a station directly on the western portion of our property, and will likely result in the company being required to permanently vacate the property and relocate elsewhere. For obvious reasons, we strongly oppose the current preferred alternative and would encourage Sound Transit to select one of the alternative routes that would not impact our property directly. It will be extremely difficult, if not impossible, for us to locate a replacement property for our current warehouse building in the same general vicinity, due to our requirement for access/loading for large semi-trucks, and due to our requirement for a significant amount of outside storage. It is conceivable we will not be able to find a satisfactory replacement property and will be forced to cease operations and rely on our nearest location in Lynnwood to serve the north Seattle area. The negative business displacement impacts that will be felt as a result of locating the station on our property are difficult to quantify at this moment in time, but will undoubtedly be substantial. Thank you again for the opportunity to provide comment. We will be anxiously awaiting future updates.

Regards,
Scott Sulman

Owner(s):

Contact ID	Name	Type	Phones	Email
909987	Keller Supply Company	Organization	+1 (206) 285-3800	
1092765	Scott Sulman	Individual		scottsulman@gmail.com

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NORDSTROM

December 9, 2024

Via electronic mail

Ballard Link Extension
Attn: Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Re: Ballard Link Extension – NEPA Scoping Comments

Dear Ms. Swift:

Nordstrom has been a part of the downtown Seattle business community since our founding in 1901. Throughout that time, we have called Seattle our home. We are proud of our Pacific Northwest heritage and are consistent champions of our local business community. For that reason, we support the stated goals of the Ballard Link Extension (BLE). Expanded mass transit in the Seattle metro area is something that we believe will benefit the entire region. Nevertheless, we write today to express concern.

The stated aim of the BLE is to provide "fast, reliable light rail connections to dense residential and job centers in the Chinatown-International District (CID), Downtown, Interbay, and Ballard neighborhoods." This is a laudable goal. But to be successful, it must be completed without harming the very neighborhoods it seeks to serve. Put another way, if disruption caused by the construction of the BLE results in the failure or departure of local businesses from the communities intended to be served by the BLE, then the project will have failed and the region will have been harmed as a result.

While we are concerned about the impact of the BLE project on the health of the entire region, let us address here some very specific concerns based on the proposed alternatives at the Westlake Station. As we are informed, construction of Alternative DT-1 would require street closures of six-years' duration on Pine Street between 4th and 5th, Pike Street between 4th and 5th, and 5th Avenue between Union and Pine, and a closure of two-years' duration on 4th between Pine and Olive. This will fundamentally impair the movement of people and goods, making it far less likely that consumers will choose to visit the area. For retail businesses like us, that rely on consumers visiting stores in order to exist, the impact of such a disruption would be catastrophic.

This type of disruption is difficult at any time and any point in an economic cycle. But it is especially dangerous when the local economy is already under strain. Since 2020 and the COVID-19 pandemic, Seattle has witnessed numerous retailers close their doors. Some failed outright and fell into bankruptcy. Others remain vibrant businesses but made the entirely sensible decision to leave Downtown in light of challenges operating in the core. Indeed, as of the writing of this letter we are one of only a small handful of retailers of scale that have maintained a presence Downtown. But if Sound Transit chooses to proceed with either Alternative DT-1 or Alternative DT-2, we will be forced to consider whether we can in good conscience continue to operate Downtown.

Allow me to share an uncomfortable economic fact. Total sales for our flagship Nordstrom store and the adjacent Nordstrom Rack are down approximately 37% when compared to pre-pandemic levels. Our business model has not declined since the pandemic. The products and services we offer did not decline. In fact, our customer offering in many respects *improved* during that time and the recovery of our stores in our best markets have rebounded far more quickly and are now back to or even surpassing pre-pandemic levels. Unfortunately, the primary driver for the decline in our Seattle-based business has been something largely outside of our control: the tremendous reduction in Downtown consumer traffic.

Customers have been slow to return to Seattle post-pandemic; as a community, we need to entice them back. The city and its businesses are working hard to do just that, and there are signs that those efforts are working, such as hotel bookings Downtown now returning to pre-pandemic levels. But office workers are not yet back in full, commercial real estate vacancies remain high, and visits to Downtown by people who live within 10 miles of the core are still below pre-pandemic levels. If we make it nearly impossible for customers to visit Downtown then we are telling them to stay away. And they will do so – understandably choosing to shop in suburban locations rather than returning to Downtown. But this is precisely what we predict will happen under DT-1 or DT-2. The contemplated street closures and other disruptions will make it nearly impossible for customers to visit the Westlake area – and so they won't.

We anticipate that the proposed disruptions to the Westlake area – under either alternative DT-1 or DT-2, will result in sufficient sales losses to require us to consider closing both our flagship Nordstrom store and our adjacent Nordstrom Rack store. This is not bluster. We have a fiduciary duty to our shareholders to run profitable stores – and if customer traffic falls below certain minimum levels then it will almost certainly render these stores unprofitable.

If we are forced to shutter these two stores it will be a sad chapter in our Company's long and storied relationship with Seattle. But it will also be a tremendous blow to the local economy. Together, these stores generate average annual sales of roughly $180 million. When we consider expected lost sales from the closure of the two stores for the duration of the disruption and the likely time period necessary to bring customers back to our Downtown locations once those disruptions are complete, we anticipate lost sales of approximately $1.6 billion. Moreover, our two stores employ several hundred people and serve as magnets to help draw consumers downtown, where they spend their dollars not only in our stores but at other local retailers as well as restaurants and theaters and hotels and museums – all contributing to the continued recovery of our Downtown core and the generation of meaningful tax revenues for the city and the region.

Of course we don't simply have stores in the Westlake area, it is also the home of our corporate campus where we employ over 2,000 individuals – the vast majority of whom commute to work from outside the Downtown. Echoing the experience seen at several other companies, many of our employees have been reluctant to return to office. Our mandate to employees to return to our campus has been fueled not only by our view that we are at our best when we work collaboratively – but also by our belief that by bringing employees back to the office we are contributing to the recovery of Downtown.

If the disruptions to the Westlake area occur as currently planned and we are forced to shutter our stores in the area, we believe it will be more difficult to attract and retain employees to work in our corporate campus – and so will need to consider whether we should continue to push forward in bringing our employees back or allow them to once again work from home, or perhaps even relocate our corporate campus to elsewhere within the Seattle metro region. Should this happen, it will be yet another blow to the nascent recovery of our once-thriving local business community, an outcome we all wish to avoid.

In closing, let me reiterate that we believe the goal of the BLE is a good one. We are supportive of increased mass transit in the area and we recognize that if we wait for a convenient time to build it the project will never begin. But we also believe that when the voters approved this project they wanted it built in a way that would not imperil the economic viability of Downtown. Put simply, they did not want to have Sound Transit build them a rail line that would connect to a Downtown filled with empty storefronts and shuttered restaurants. Under the proposed alternatives for the Westlake area, we fear that is exactly what will occur. We urge you to go back to the drawing board and consider whether it is even necessary to expand Westlake Station to accommodate the BLE and, if you believe it is necessary, to give additional consideration to where that expansion should occur.

Sincerely,

Erik B. Nordstrom
CEO, Nordstrom, Inc.

cc: Hon. Bruce Harrell
Executive Dow Constantine
Rachel Smith, Seattle Metro Chamber of Commerce
Jon Scholes, Downtown Seattle Association
Hon. Christine Gregoire, Challenge Seattle

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206-294-3285
www.SODOSeattle.org

Business Improvement Area
Advocating for a Safe, Clean, Connected and Engaged SODO

2450 6th Avenue S. Suite 100
Seattle, WA 98134

To: Lauren Swift via blescoping@soundtransit.org
From: Erin Goodman, Executive Director
Date: 9 December 2024
RE: Ballard Link Extension Scoping Letter

The SODO Business Improvement Area (BIA) was formed in 2013 to enhance the district's safety, cleanliness, mobility and to provide a voice for the more than 1,200 businesses and 47,000 employees working in this area. SODO is a district in transition, with a new generation of manufacturing, logistics, commercial and retail businesses emerging. SODO businesses rely on effective and reliable surface street operations for all travel modes, including freight and transit.

Since 2017, the SODO BIA has actively worked to educate Sound Transit on how SODO's unique, industrial ecosystem operates and to ensure the district's needs are met during the planning, construction, and operation of the light rail expansion. Throughout the EIS (environmental impact statement) process for the West Seattle Link Extension project, the SODO BIA was clear with staff that the stakes of building light rail through Seattle's industrial heart are high but not insurmountable, and the BIA recognized and acted upon the critical need to familiarize decisionmakers with what was at risk if the light rail expansion is insensitive to SODO's operations. More specifically, the BIA participated in the EIS scoping, regularly hosted public engagement events for Sound Transit, provided tours for Sound Transit board members and staff, and submitted technical questions and comments on the Draft EIS for the West Seattle Link Extension project. The original scoping letter sent to Sound Transit by the SODO BIA in 2019 for the West Seattle/Ballard Link Extension DEIS is included in **Attachment A**.

The West Seattle Link Extension Final EIS was published in September 2024 and clearly demonstrated that the BIA's efforts and concerns were primarily ignored. In response to the Final EIS, the SODO BIA provided Sound Transit with a letter dated October 18, 2024, reiterating concerns with the potentially significant impacts to SODO. The BIA greatly appreciates the amendment Sound Transit's Board of Directors passed when selecting the West Seattle Link Extension to be built. In the weeks after the amendment passed, Sound Transit staff reached out to the BIA and organized several engagements in an effort to reset our working relationship, and we look forward to continuing to collaborate with Sound Transit staff in the future. It is with this collaborative spirit that we share the following concerns regarding the Ballard Link Extension, and we request Sound Transit's thoughtful consideration of these matters when scoping the new EIS process.

Scoping Items for Consideration – Ballard Link Extension Draft

Sequencing and Construction Impacts – the West Seattle and Ballard Link Extension projects will require extensive changes and closures to 4th Avenue S, 6th Avenue S, the SODO Busway, S Holgate Street, and S Lander Street. While potential timing is highlighted for some individual elements of construction on these roadways in the Final EIS for the West Seattle Link Extension, there was little consideration to sequencing these changes to reduce the impacts to businesses, maintaining functionality in the district, or integrating the two projects. All modes of transportation are expected to feel the impact of these closures, especially freight and transit as key connectors lose functionality throughout the life of the projects and beyond. The Ballard Link Extension EIS should also identify impacts and mitigation to pedestrian facilities with the

goal of providing safe, convenient experiences during and after construction. Additionally, the EIS should identify freight impacts during construction along the heavy truck corridors, including but not limited to providing anticipated truck volumes specifically generated by the Ballard Link's tunneling operations.

Construction Timeline – the Draft EIS should clearly identify the construction timeline for the Ballard Link Extension, how the project may impact the construction timeline for the West Seattle Link Extension, and what elements of the EIS process need to be done prior to construction of the Ballard Link Extension (i.e., what percent of design needs to be complete for Final EIS).

Rezoning and Rerouting Impacts – the Draft EIS should clearly state how zoning changes may impact traffic demands in SODO and should identify any rerouting of traffic required during and after construction.

Connecting to West Seattle Link Extension – the Draft EIS should clearly identify how the Ballard Link Extension will connect to the West Seattle Link Extension. Several project elements, such as the SODO Busway and the SODO Trail, do not fit neatly into the Ballard Link Extension or the West Seattle Link Extension. Sound Transit should provide the necessary information to properly understand the impacts to elements that transcend both projects, including but not limited to the SODO Trail relocation, SODO Busway closure, the location of the future tunnel, how tunnel construction will occur, and plans for S Holgate Street.

Impacts to Other Major Development Projects – the Draft EIS should clearly identify how the Ballard Link Extension may impact and be impacted by other major development projects, and how coordination with these projects will be managed by Sound Transit. This includes such projects as the new King County Civic Campus in SODO, the expansion of Amtrak's maintenance and operations facility, the U.S. Coast Guard's Expansion and Modernization of Base Seattle project, and a potential street vacation on S Holgate Street.

Interagency Coordination and Inclusion of the SODO BIA – interagency coordination should be implemented under the Ballard Link Extension Draft EIS to address utility relocation, transit accessibility, SODO Trail relocation, tunnel planning and dirt hauling, general mitigation, and stadium event coordination. The SODO BIA respectfully requests that Sound Transit directly include our representatives during this process as we act as a conduit between hundreds of businesses, property owners, and other constituents in our membership on a host of transportation, public infrastructure, utility, land use, and other maintenance matters with these existing agencies.

Multimodal Connectivity – the Draft EIS project alternatives should provide safe, efficient and reliable access to light rail facilities from all quadrants of SODO. A full analysis of multimodal access needs should consider the complete Link route from the SODO light rail station to the stadium facilities between 1st Avenue S to the west and Airport Way S to the east, at a minimum, in order to identify these impacts and needs.

SODO Busway Impacts – the Draft EIS should study impacts to freight and transit mobility caused by the closing of the SODO Busway. While a part of the West Seattle Link Extension mitigation plans, the impacts of the Busway's closure were not previously explored, and the Busway extends into the Ballard Link Extension project corridor. The current use of the SODO Busway for bus movements through SODO is a critical element of the overall mobility for freight and people in Seattle, and permanently closing the SODO

Busway with the proposed Link Light Rail extensions will trigger a full rework of 4th Avenue S between S Spokane Street and S Holgate Street. It is critical to identify a feasible mitigation strategy for SODO Busway closure impacts as part of the Ballard Link Extension environmental review that does not trigger direct impacts to mobility or harm nearby businesses. Additionally, use of the SODO Busway for this light rail extension must be identified as an impact to SODO district businesses and to King County Metro operations.

Station Connections to Stadium – the Draft EIS should discuss improvements to the existing Stadium Station and provide plans to increase safe connections to the proposed CID station(s). Additionally, the Draft EIS should identify improvements required to provide safe connections from the CID South and Stadium stations to each stadium (e.g., wayfinding, lighting, infrastructure etc.).

Station Facilities – the Draft EIS project alternatives should consider what facilities are needed at the Stadium and/or CID stations for pick up and drop off activities, what facilities would accommodate local transit and circulation routing, and how this project will provide for local bus layover. Layover and transit connections should not impact adjacent businesses or operation. This will need to be accommodated outside of the public right of way, in order to provide for loading and waiting activities.

Station Transfers – the Draft EIS analysis should evaluate passenger Link transfer needs wherever they are proposed and enhance existing/proposed station areas to accommodate these transfer needs in combination with weather protection and large event passenger demands. The Draft EIS should evaluate how new transfer locations may impact the West Seattle Link Extension or other stations and identify mitigation, if applicable.

Parking – the Draft EIS project alternatives should address "Hide and Ride" Parking Impacts. This plan must study the impact of on-street parking near the Stadium station. Currently we see significant impact from link riders that use SODO surface parking to access the light rail for other destinations because parking is free and untimed. Parking should remain available for accommodating local businesses' patrons and employees who rely on the existing street and right-of-way parking and road access near the Stadium station.

Circulation – the Draft EIS project alternatives must identify impacts to SODO travel, circulation, businesses and employees. SODO relies on reliable and efficient truck circulation and any impacts on freight will impact businesses and community livelihood.

Please ensure that these issues are fully addressed in the environmental review of the proposed Ballard Link Extension project. These issues of mobility in all travel modes are critical to SODO businesses and very important to the SODO BIA.

Sincerely,

Erin Goodman
Executive Director

Attachment A

206-294-3285
www.sodoseattle.org

SODO Business Improvement Area
Advocating for a Safe, Clean & Moving SODO

270 S Hanford St, Suite112
Seattle, WA 98134

April 2, 2019

West Seattle and Ballard Link Extensions
c/o Lauren Swift, Sound Transit
401 S Jackson St.
Seattle, WA 98104

Dear Ms. Swift:

The SODO Business Improvement Area (BIA) was formed in 2013 to enhance the district's safety, cleanliness, mobility and to provide a voice for the more than 1200 businesses and 47,000 employees working in this area. SODO is a district in transition, with a new generation of manufacturing, logistics, commercial and retail businesses emerging. SODO businesses rely on effective and reliable surface street operations for all travel modes, including trucks and buses. The SODO BIA supports a light rail station with an alignment which delivers light rail service with the least impact on businesses, freight, and overall mobility within SODO.

Study Impact to freight and mobility of closing E3 Busway SODO is home to the Ryerson/Atlantic/Central Bases for King County Metro operations which deliver huge bus service both within Seattle and supporting the region. The current and continued use of the E-3 Busway for bus movements through SODO is a critical element of the overall mobility for freight and people in SODO. While the E-3 Busway appears to be an attractive public resource available to Sound Transit for trackway expansion, it is also the vital link for regional bus service delivery through SODO. Any compromise to that facility for bus service would relocate buses to the surface streets in SODO and compromise surface street operations for truck freight movements and overall mobility in SODO.

Use of the E-3 Busway for this light rail extension must be identified as an impact to the SODO district businesses and to King County Metro operations – for which mitigation must be identified and provided. Any alternative which would displace buses from the E-3 Busway would have significant impacts on SODO surface street operations and circulation for both trucks and buses – which are both critical to SODO business and neighborhood vitality. The environmental analysis must fully explore the alternatives to using the E3 Busway and fully reflect these potential impacts to freight movement and people movement via local buses.

Increase mobility within SODO SODO relies on effectively getting employees to and from work and accessibility to light rail is key for business growth in SODO. How will the project alternatives provide safe, effective and reliable access to light rail from all quadrants of SODO?

Link light rail must be accessible by all who work in SODO – accessible by foot, by bike, by transit connection and by other delivery means. Link stations must be accessible, safe and reliable throughout the service day – for all travelers. Station design needs to provide shelter for all time periods, and all weather conditions. Existing station amenities are minimal and insufficient for the anticipated demand. Future stations must provide for bicycle parking, local transit connections, pick up and drop off functions to ensure that all travel modes can access light rail at each station.

Pedestrian safety is paramount for access to and from the proposed light rail stations. This needs to be considered for the SODO and the Stadium stations – where high volumes of riders will access the station. A full analysis of access needs

Attachment A

will consider the full route from the light rail station to the stadium facilities and to 1st Ave South on the west and to Airport Way on the east, at a minimum, in order to identify and mitigate pedestrian impacts.

What facilities will be in place at SODO and Stadium stations for pick up and drop off activities? What facilities will accommodate local transit and circulation routing? How will this project provide for local bus layover? Layover and transit connections should not impact adjacent businesses or operation. This will need to be accommodated outside of the public right of way, in order to provide for loading and waiting activities.

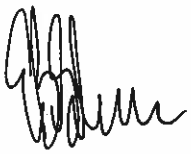
Address "Hide and Ride" Parking Impacts This plan must study on-street parking impacts near the stations. Currently we see significant impact from link riders that use SODO surface parking to access the light rail for other destinations. Parking should remain available for accommodating local businesses' patrons and employees who rely on the existing street and right of way parking and road access near the SODO and Stadium stations.

Study Impacts of North or South Duwamish Crossings on Existing SODO Businesses Light rail alignment impacts must be identified and mitigated for intersections and businesses in SODO affected by column placement. There are currently two choices for crossing the Duwamish and they appear to have significantly different impacts on SODO. A full study on the business displacement and traffic impacts from the two alignment tracks and the accessory bridges to access to the Operations and Maintenance Facility needs to be studied to understand the disparate impacts on SODO

Summary Implementation of Link to West Seattle and through SODO to Downtown and Ballard must consider impacts to SODO travel, circulation, businesses and employees – which includes both light rail alignment impacts to property plus alignment side effects such as the closing of the E3 Busway to buses – and the rerouting of buses to the surface streets. SODO relies on reliable and efficient truck circulation and any impacts on freight will impact businesses and community livelihood

Please ensure that these issues are fully addressed in the environmental review of the proposed light rail extension from West Seattle to Downtown through SODO, and from SODO through Downtown to Ballard. These issues of mobility in all travel modes are critical to SODO businesses and very important to the SODO BIA.

Sincerely,



Erin Goodman

Executive Director, SODO Business Improvement Area

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Ballard Link Extension
Attn: Lauren Swift, Sound Transit
401 S. Jackson Street
Seattle, WA 98104

blescoping@soundtransit.org

December 6, 2024

Re: Scoping Comments for the Ballard Light Rail Extension's Second Draft Environmental Impact Statement

Dear Ms. Swift,

This comment letter is submitted on behalf of Vulcan Real Estate to provide feedback during the scoping period for the revised Ballard Link Extension (the "BLE") Draft Environmental Impact Statement ("DEIS"). Vulcan Real Estate owns properties in downtown Seattle, particularly throughout the South Lake Union neighborhood, including properties that will be directly and indirectly impacted, and others that have been noticed for potential acquisition or lease. Moreover, we write as concerned neighbors. The long-term vitality of South Lake Union and downtown depend on the agency's ability to construct Sound Transit 3 efficiently and without undue harm. It is critical that Sound Transit carefully study and plan for the cumulative impacts of constructing multiple stations concurrently. Only with careful planning can we deliver a world-class transit system while preserving the neighborhood's vibrant mix of residents, cultural institutions, non-profits, small business, and large employers that the neighborhood enjoys today.

Despite years of engagement and process, significant questions remain about the construction plans and impacts in South Lake Union, particularly around the Denny Station. We are also concerned about the cumulative impacts of the construction of the nine Seattle stations that are part of this alignment. We expect the revised DEIS to thoroughly address the gaps and analysis that we requested in our previous comment letters, as the 2022 DEIS failed to do so.

Vulcan Real Estate looks forward to the expanded light rail network serving the region through the BLE. Since beginning operations in 2009, Link Light Rail has been a valuable asset in our region, improving access to job centers and housing that bolster our economy and support the density needed for a growing urban environment. However, the 2022 DEIS did not adequately disclose, analyze, or address the foreseeable negative impacts likely to be caused under the current construction plans for the South Lake Union and Denny Station locations. These construction impacts could cause long-term harm to the communities light rail is intended to serve. Our concerns were detailed in public comment letters submitted in 2022 in response to the original DEIS issued January 2022, and we add them here by reference.

In addition, the revised DEIS includes options that were not included in the 2022 DEIS, namely the Denny Station options "Westlake Shifted North" and "Westlake Shifted West". Vulcan Real Estate requests that Sound Transit complete the required DEIS analysis by studying and addressing the following issues:

- **Disclosure of underground conditions and utilities** – The previous DEIS failed to accurately and adequately identify and assess underground utilities and how their location, need to be altered, accommodated or moved would impact construction timelines, logistics, and budgets. The construction timelines and budgets in the original DEIS are inaccurate, unreliable and silent on community impact. To be considered an adequate DEIS, there must be disclosure and analysis of all affected underground facilities and utilities. Specifically, describe the scope, schedule, and cost implications of temporary and permanent relocation of overhead and subterranean utilities owned by Seattle City Light, Seattle Public Utilities, King County Metro under Westlake Avenue, Denny Way, and Harrison Street. The narrative should also include all private and public utility connections adjacent to any construction activities. The analysis should address what streets these utilities will be relocated to and from, noting the timing and duration of these relocations. Additionally, the revised DEIS should provide an aggregated view of station-specific impacts as well as the regional impact of concurrent station construction occurring blocks apart.

- **Due diligence regarding construction logistics** – The 2022 DEIS alternatives have not been vetted with construction experts who can confirm the feasibility of the construction approaches and timelines. The updated analysis must disclose the full scope of construction activities, allowing assumptions to be tested and significant impacts during construction to be properly assessed.

- **Direct and indirect impacts to properties** – The revised DEIS introduces options not identified in the 2022 DEIS. To complete this analysis well, it is essential to understand the sequence of construction and comprehensively identify the resulting impacts to properties. The revised DEIS must disclose the full construction sequence and duration, including site-specific details and a comprehensive regional review relative to timeline and schedule.

- **Transportation and access, including cumulative construction impacts across South Lake Union and downtown** – A downtown-wide traffic model is essential to adequately understand the cumulative impacts of closures and detours, enabling adequate planning and mitigation. The analysis should detail specific locations, blocks and timeframes for street closures, including bike lane closures and sidewalk closures,

for stations that will be simultaneously under construction. This analysis must include forecasted trip and Level of Service metrics before and during construction, as part of an aggregate regional impact analysis.

- **Transportation detours and mitigation**– For the revised DEIS to be considered adequate, the impacts on pedestrians, bicyclists, transit users, vehicle circulation, truck and freight traffic must be fully disclosed. In particular, the Preferred Alternative eliminates the South Lake Union Streetcar for a minimum of eight years, excluding the additional time required to resume operations. Pre-pandemic the streetcar carried 2,000 riders daily, and SDOT projects that its extension on First Avenue could increase ridership to 28,000 riders daily. The DEIS must detail plans to replace this service during construction and account for bus detours around Westlake Avenue during partial and full street closures. Reduced transportation services and delays must be analyzed and mitigated.
- **Construction staging** – The revised DEIS should include detailed construction logistics plans showing how material, equipment, and labor force will be managed. This includes proposed sites for labor force parking, job and support offices, and transportation to and from parking areas to project sites.
- **Construction worker parking and site access** – Construction activities will require hundreds of workers to park and access sites daily. Without designated parking, workers may occupy valuable curbside spaces needed for businesses and residents, further straining limited parking availability. At shift changes – anticipated to be three times daily – worker traffic will exacerbate congestion. Since the streets will already be near gridlocked from street closures and regular vehicle traffic, the revised DEIS must propose proactive parking and traffic mitigation strategies to address these issues.
- **Material removal and truck traffic** – Boring the 3.3-mile tunnel will require the removal of an enormous amount of material requiring transport through the city. During tunnel boring, there will be a continuous stream of dump trucks, concrete trucks, material deliveries, equipment mobilizations and demobilizations. Trucks will use major arterials like Denny Way, Mercer, Westlake, and Dexter to access I-5. This truck volume will add incredible stress to a severely constrained grid. The DEIS must analyze these impacts and propose mitigation strategies. The revised DEIS must quantify the volume of construction truck traffic required each day to remove this material, anticipated haul routes, and the corresponding impacts to the street grid and level of service.
- **Potential loss of tenants and businesses due to closures and construction impacts** – The DEIS estimates that construction of the BLE will take about ten years to complete, with each station taking five or more years. The 2022 DEIS only considered impacts to

businesses directly losing property access, overlooking broader effects on small businesses unable to endure prolonged disruptions. The revised DEIS must analyze indirect impacts on businesses, non-profits, and other organizations and propose creative strategies to offset economic harm.

- **Long-term economic impacts** – Beyond construction impacts, the revised DEIS must analyze long-term economic effects, such as loss of transit access, increased vacancies due to business displacement, tenants relocating or moving away from construction areas, and visitors avoiding downtown. Significant adverse effects on the neighborhood will extend beyond the construction period, and the revised DEIS must address these cumulative economic impacts. The 2022 DEIS considers 10-year impacts "short-term" impacts despite the long-term nature of their effects. The revised DEIS should evaluate 10-year impacts as permanent impacts to be mitigated.
- **Developing mitigation strategies** – Sound Transit must quantify and detail foreseeable impacts, offering commensurate mitigation measure. These should include compensation, location-specific mitigation plans, and clearly defined means and methods contractors will be allowed to use. Construction mitigation methods must be finalized prior to contractor selection and incorporated into contracts. The 2022 DEIS provided insufficient detail, and we request a comprehensive analysis of mitigation measures in the revised DEIS.

We look forward to reviewing the revised DEIS and working with Sound Transit to minimize impacts while advancing this important project.

Sincerely,

Ada M. Healey, Chief Real Estate Officer
Vulcan Real Estate

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Appendix D

Community Organization Comments

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ALLIANCE FOR PIONEER SQUARE

December 9, 2024

Via email (blescoping@soundtransit.org)

Ballard Link Extension
Attn: Lauren Swift, Central Corridor Environmental Manager
Sound Transit
401 S Jackson Street
Seattle, WA 98104-2826

Re: Scope of the EIS for the Ballard Link Extension

Dear Lauren Swift:

This letter is submitted on behalf of the Alliance for Pioneer Square. The Alliance appreciates the opportunity to have input into the scope of this very important environmental document. The Ballard Link Extension ("BLE") has the potential to materially improve the mobility of Seattle residents from currently difficult to reach neighborhoods, to reduce the number of buses from those neighborhoods that must ply the streets of Downtown Seattle, and to make a material improvement in public transit for the region. But it also poses environmental risks. In the 1980s Seattle watched the construction of the Third Avenue bus tunnel destroy a healthy commercial neighborhood along Third Avenue, damaging the urban fabric of that formerly vital street for decades, if not permanently. The BLE EIS is one of the few opportunities the public and Sound Transit will have to look comprehensively at the short- and long-term impacts of the Ballard Link Extension, to consider alternatives that may reduce its adverse impacts and enhance its benefits, and to identify mitigation for adverse impacts that cannot be entirely prevented.

We implore Sound Transit to consider all alignment and station location alternatives appropriately, and in accordance with NEPA and SEPA regulations. We look forward to robust engagement with proper analyses, documentation, and reports given to surrounding communities so we are able to engage in thoughtful and well-educated discussions with Sound Transit.

I. The Affected Environment of Pioneer Square

The Alliance for Pioneer Square is a nonprofit organization leading the revitalization of Pioneer Square Historic District through advocacy, programming, marketing, and community action. It works to help preserve what makes Pioneer Square the most authentic, engaging, and dynamic neighborhood in Seattle. By fostering pivotal new programs and facilitating crucial neighborhood action, it helps Pioneer Square move to a more vibrant and better place for everyone to live, work, and visit.

Visit: 105 S Main, Suite 201 Seattle, WA 98104
Mail: PO Box 4507 Seattle, WA 98194
T. 206.667.0687 allianceforpioneersquare.org

Pioneer Square is both a group of individually historic buildings and an historic district—one of the first such historic districts to be listed on the National Register of Historic Places. Both individual buildings and the district require constant reinvestment, and for that reinvestment to be possible, the district must be both accessible for transit riders and vehicles alike and be a desirable place to live, work, and visit. Attracting both residents and office users to its upper floors requires that its street level be attractive: walkable, lined with shops and restaurants and full of dynamic life. If the shops and restaurants fail, the upper floors hollow out. In the years since 1970, when the Pioneer Square-Skid Road Historic District ("Pioneer Square Historic District") was placed on the National Register, experience has taught that Pioneer Square is a delicate thing. Its fortunes have waxed and waned, as much based on City policies and actions as from economic cycles. For instance, the First Avenue South water main replacement, which took six months longer than planned, kept visitors away from First Avenue South during the critical tourist season, and left retailers reeling during a period of otherwise robust commercial health for the rest of the city. When conditions become undesirable, it can take years to turn things back around. In the meantime, historic buildings can be lost to unsympathetic replacements, from which the district never recovers.

Pioneer Square is just now nearing more than a decade of public mega projects, including the Alaskan Way Viaduct Replacement Project, the Elliott Bay Seawall Replacement Project, the Washington State Ferries Colman Dock expansion, construction of the First Hill Streetcar, replacement of the water main under First Avenue South, and the East-West Pedestrian Streets Improvement Project. Although these projects are nearing completion, the neighborhood is already facing its next biggest challenge: the vulnerability of areaways and the infrastructure challenges related to degrading street walls. Its ability to withstand these mega projects is in significant part a result of impact mitigation that those projects have provided. Undoubtedly similar mitigation will be required to withstand construction of the Ballard Link Extension.

II. Scope of the Ballard Link Extension EIS.

With that foundation as to the affected environment that the Ballard Link Extension will impact, the EIS must address the following issues:

A. Project Area Definition

It is a notable oversight that the Notice of Intent to Prepare an EIS published by the FTA on October 24, 2024 did not specifically list the Pioneer Square neighborhood in the service area for the Light Rail Alternatives, while three of the alternatives being evaluated fall within the Pioneer Square Historic District. The Alliance for Pioneer Square was not included as an interested party in Sound Transit's Stakeholder Advisory Process in 2018, and the neighborhood's voice is clearly missing from the body of work used to shape early alternatives in the 2019 DEIS. The EIS project area must include the entire Pioneer Square Historic District within the service area defined for the Project and must evaluate the operational and construction impacts of the Project on the neighborhood for all disciplines studied in the EIS.

B. Transportation Analysis

The EIS must address how the Ballard Link Extension will change the number of buses that travel into and through south downtown. Pioneer Square and the Chinatown-International District have several Metro bus layover locations that are detrimental to our neighborhood fabric. With historic and narrow streets, the highest and best use of all our curb space is of utmost importance. Bus layover zones have increased in the past few years, and many create a wall of buses that block visual access to our historic buildings and vibrant retail scene. The EIS must include a study of how many of these layover locations can be converted back into parking or load/unload spaces with each alternative based on ridership estimates and Metro bus elimination.

The EIS should provide comprehensive walk-shed analyses for all proposed station locations, focusing on Pioneer Square residential buildings and major employment centers. If major employment centers are not included within a 10-minute walk-shed of proposed locations, the EIS should provide a properly adjusted ridership estimation for those proposed light rail station locations.

The EIS should also provide comprehensive and detailed analysis of how access to South King County, Pierce County, and SeaTac Airport will be maintained or changed based on station locations and alignment. Many in our employment base come from South King County and rely on the current 1 Line alignment to get them to and from Pioneer Square. Augmenting this commute by requiring transfers or farther walks to distant stations will severely impact our goal of reducing single occupancy vehicles to and through Pioneer Square, thus negatively impacting Sound Transit's ridership goals. Pioneer Square employers, residents, and stakeholders need this valuable information to develop their opinions on alignment and station location alternatives.

As a final note in regard to transportation analysis, the Alliance for Pioneer Square maintains a settlement agreement for the reduction of lanes on Alaskan Way within 15 months of the opening of the Alaska Junction Station of the West Seattle Link Extension project. While the BLE project does not include the Alaska Junction Station, it is imperative that Sound Transit understand and study the effects of this agreement on the BLE station and how it connects in and through Pioneer Square. We have included the full settlement text as an attachment to this document for reference. While separate projects, we believe this EIS must recognize those commitments and explain how Sound Transit will work with the City to bring them to fruition.

C. Parking

We all look forward to a day when abundant public transit greatly reduces the need for personal automobiles to get to and from Pioneer Square. And while we believe this will happen gradually over time, we are greatly concerned about the degradation over time of the parking needs to support Pioneer Square, while simultaneously locating transit needs further and further away from our employment and residential base. The Alaskan Way Viaduct Replacement Project eliminated several thousand on-street parking spots available to the Pioneer Square neighborhood. The pre-work for the now-stalled Center City Connector streetcar project eliminated even more spaces along with further restrictions because of crumbling street walls and precarious areaways. We had hoped for additional light rail to support this depletion of our parking, but as the alternatives suggest, these station locations keep moving further away from the core of our neighborhood, and therefore are not suitable solutions to the many employees and residents in Pioneer Square. Thus, it is important that the EIS carefully analyze and fully mitigate any

impact of the Project on future public parking supplies, especially in consideration of potential alignments that do not serve the majority of our population.

D. Construction Impacts

By far the most significant adverse impacts of the Ballard Link Extension Project are likely to be construction impacts. Depending on the construction method chosen, those impacts could be extremely disruptive for several years. It is essential that the EIS carefully analyze the construction impacts including haul routes on transportation, parking, business and residential access, emergency services, vibration, noise, and air quality. If an alignment on or adjacent to Union Station is chosen, it will be important to pay particular attention to the impact on the Union Station garage, access to it, and the historic Union Station building itself. Always maintaining access for employees and vendors to all businesses during construction will be critical, and the EIS should explain how that will be accomplished.

As a gateway neighborhood to and from Seattle in many ways, Pioneer Square often takes the brunt of bus diversion and congestion from mega project impacts around the city. The Ballard Link Extension Project construction may interrupt or divert buses from major bus corridors, and the EIS must study alternatives to avoid first, then minimize bus diversion through Pioneer Square during construction.

We are equally concerned that because of the splitting of the two ST3 Projects (WSLE and BLE), Pioneer Square will be burdened by two separate construction projects. All attempts to consolidate construction impacts from both projects into one period must be considered, explored, and explained for each alternative in the EIS.

Although construction impacts cannot be avoided entirely with a mega project such as the BLE Project those impacts can be mitigated, and it is essential that the EIS identify the construction mitigation that will be provided. Pioneer Square's recent experience with the highly disruptive Alaskan Way Viaduct and Elliott Bay Seawall Replacement Projects, the First Hill Streetcar construction, and the replacement of the First Avenue water main shows that with adequate mitigation, construction impacts may not be fatal to the vibrant street experience that is the foundation for Pioneer Square's success. Of critical importance was the funding of parking assistance, including reduced-cost short term parking in area garages and programs to inform visitors where parking is available, commitments (which must be kept) to cease construction during critical visitor periods, and funding of community information personnel, so that there is a direct line of communication between the project and the community and so that businesses and residents get as much warning of disruption as possible and know how to communicate back to the project management.

On the other hand, the City's experience with the construction of the Third Avenue transit tunnel in the 1980s is that it left a wake of business closures that attracted street crime and required decades to cure. Major public projects will have significant adverse impacts on the communities that must endure them, but the function of the EIS is to disclose those impacts, consider alternatives that will reduce the impacts, and identify what mitigation measures may limit the scope of the damage.

E. Public Realm, Land Use and Urban Design

The Alliance for Pioneer Square recently collaborated with Historic South Downtown Community Preservation & Development Authority and Seattle Chinatown International District Preservation and Development Authority in a robust community-based planning project to envision the connectivity between the Pioneer Square and Chinatown-International District neighborhoods, where they come together at the intersection of S. Jackson Street between Third and Fifth Avenues. This planning project, called The Jackson Hub project, essentially defines the future vision of shared public realm spaces that connect Seattle's iconic transportation landmarks, Union Station and King Street Station and the two historic neighborhoods. These landmark transportation hubs fall within both the Pioneer Square Historic District, and the Chinatown-International Historic District, and all BLE project alternatives will impact these historic resources and the surrounding environments. The Alliance for Pioneer Square requests that Sound Transit consider including design concepts and public realm improvements identified in the Jackson Hub project report in the designs and alternatives studied in the EIS. The EIS must also study the impacts of the alternatives on the neighborhood's ability to realize Jackson Hub project goals.

The Project plans provided to date do not provide any image of how the Project may affect the streets near the tunnel entrance, the streets the tunnel passes under, and the area of any stations. It is important, however, that those components be designed to be compatible with the historic neighborhoods through which they will pass. Pioneer Square and Chinatown-International District are both fine scaled, with small buildings, attractive, narrow streets, and human-scaled facades. That character is essential to maintaining the attractive street life and vibrant commercial businesses that create the quality of the neighborhood. Design of the Project in the Pioneer Square area must be consistent with that scale and character and must maintain the fabric of the streetscape.

F. Social and Environmental Justice

Pioneer Square is among the King County neighborhoods with the highest density of vulnerable populations. According to the U.S. Census, over 40 percent of the Pioneer Square identifies as minority (2012-2016 American Community Survey). More than fifty percent of the population in Pioneer Square have incomes below the federal poverty level (2014-2018 HUD Comprehensive Housing Affordability Strategy Data). Over 750 low-income individuals live in subsidized housing within a few-block radius of what is labeled as the preferred alternative of the north Pioneer Square Station. These populations require the utmost care and consideration and will be most impacted by disruptions to their daily life. Additionally, Census Tract 92, which comprises the majority of Pioneer Square, has the highest concentration of homelessness in King County, at 20%. For comparison, King County's homeless population is less than 1% [2020 Census (P.L. 94-171) Redistricting Data].

Over the years, community and human services organizations have located in and near Pioneer Square to support our most vulnerable community members. Maintaining access to these and other public services, such as first responders and emergency medical care, is essential throughout the duration of construction.

The EIS must identify environmental justice populations living in Pioneer Square—including homeless populations, which are frequently missed or undercounted, and not typically accounted for in the surveys and resources transportation planning professionals use to perform analysis. Sound Transit should engage community and human service organizations to understand the scope, scale, and demographics of the homeless populations they serve for inclusion in the EIS. It must evaluate the

potential impacts of the Project on environmental justice populations, including resources and institutions of particular importance to our neighborhood's minority, low-income, and homeless community members. Finally, the EIS will need to make a determination of whether project alternatives have a disproportionately high and adverse impact on environmental justice populations.

As described earlier in this letter, business and community leaders in Pioneer Square have worked hard to establish a vibrant neighborhood. Quality of life and community cohesion in our neighborhood is on the rise—our residents and businesses enjoy enticing and well-maintained public spaces and opportunities to gather and connect with one another at community events such as Art Walk. We know from past experience that maintaining this vibrancy requires vigilance, and once damaged, takes decades to repair. We expect the EIS to recognize the social resources and community cohesion in Pioneer Square and analyze how the project alternatives would benefit and impact these resources and cohesion.

G. Historic Resources and Section 106 Compliance

As with all mega transportation projects utilizing federal funds within the Pioneer Square Historic District, Sound Transit will be required to comply with Section 106 of the National Historic Preservation Act. As stewards of the historic character and fabric of the neighborhood, The Alliance for Pioneer Square requests to be a consulting party to the Section 106 process for the Ballard Link Extension Project. To that end, we are requesting early coordination and participation in design development, to shape the design performance requirements that will ensure the historic character of the resources and the district are maintained.

III. Extended Comment Period

In 2022, the comment period was extended to 90 days to recognize the complexity of this project but also the challenges of engaging some sectors of Seattle's communities. We request at least a 90-day comment period for the forthcoming Ballard Link Extension DEIS. Additionally, we ask that translated materials be provided at the outset of this comment period, along with resources for language access throughout the process.

Again, thank you for your consideration of these comments. Alliance for Pioneer Square looks forward to working with you in the development of this important public project.

Very truly yours,

Lisa Howard

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AGREEMENT REGARDING AWPOW BETWEEN THE ALLIANCE FOR PIONEER SQUARE, THE CITY OF SEATTLE, WSDOT, AND KING COUNTY

RECITALS

A. The City of Seattle ("City") is the proponent of a series of contiguous projects, known as the Alaskan Way, Promenade, and Overlook Walk ("AWPOW") which are a series of public improvements extending from south of S. King Street on the south to Battery Street on the north, generally along Seattle's waterfront and including Alaskan Way.

B. The City is the lead agency for AWPOW, and in that capacity has issued a Final Environmental Impact Statement ("FEIS") on AWPOW dated October 31, 2016.

C. The City intends to pay for AWPOW through several sources of funding, one of which is a local improvement district ("LID"), through which it expects to raise up to $200 million from parties whose property receives "special benefit" from AWPOW.

D. Alliance for Pioneer Square ("Alliance") is a nonprofit organization leading the revitalization of Pioneer Square Historic District ("Pioneer Square"). It has filed an appeal of the adequacy of the FEIS to the City Hearing Examiner, contending that the FEIS is inadequate to meet the City's responsibilities under RCW ch. 43.21.C ("SEPA") on multiple grounds.

E. The Washington State Department of Transportation ("WSDOT") has intervened in the appeal of the FEIS to the Hearing Examiner. It is interested in AWPOW because Alaskan Way south of Colman Dock serves as State Route 519, provides access to the Seattle Ferry Terminal at Colman Dock, which is a WSDOT facility, and serves as one of two north-south freight routes through Seattle. In addition, WSDOT owns the property proposed as the location for the "Habitat Bench." WSDOT has also relied on the FEIS to sign Amendment No. 11 to GCB 1308, and has published a Notice of Action under SEPA of the signing of Amendment No. 11 to GCB 1308 ("Amendment 11"), relying on the FEIS for its compliance with SEPA in signing Amendment 11. Alliance has filed an action in King County Superior Court, Case No. 17-2-01514-8 SEA, challenging the validity of the State's action as described in the Notice of Action issued on December 21, 2016.

F. King County ("County") has intervened in the appeal of the FEIS to the Hearing Examiner. County has assumed the duties of the Metropolitan Municipal Corporation under RCW ch. 35.58, and operates bus transit service ("Metro") throughout King County. AWPOW includes the addition of two dedicated lanes for buses on Alaskan Way south of Columbia Street, on which Metro intends to run approximately 600 buses per day once the Alaskan Way Viaduct is removed. The combination of those transit lanes and turning lanes for vehicles waiting to

enter Colman Dock will result in Alaskan Way being between seven and eight lanes wide south of Yesler Way, adjacent to Pioneer Square.

G. City, WSDOT and County deny that the FEIS is inadequate. Without admitting any of the contentions of Alliance in its appeal to the Hearing Examiner, City, WSDOT and County are willing to take the following actions and make the following commitments, in consideration for Alliance dismissing its appeal of the adequacy of the FEIS before the Hearing Examiner and the suit challenging the validity of the State's actions described in WSDOT's Notice of Action and agreeing not to file any additional appeals related to AWPOW.

H. Sound Transit is currently in the process of designing and implementing a group of projects known as "ST 3." One component of ST 3 is extension of Link Light Rail to West Seattle. When the extension of Link Light Rail to the Alaska Junction Station in West Seattle is completed and open to service, Metro expects that its need to operate buses on Alaskan Way and Columbia Street west of Third Avenue will be significantly reduced.

I. The Port of Seattle, while not a party to this Agreement, is providing funding for the Alaskan Way Viaduct Replacement Program, which includes the improvements to Alaskan Way that are being constructed as part of AWPOW, pursuant to an agreement executed on August 27, 2013. Under this agreement, WSDOT has committed to ensuring that the Alaskan Way Viaduct Replacement Program will be designed and constructed to facilitate efficient movement of freight and other traffic on the west corridors of the Seattle transportation system between the Duwamish Waterway and the Ballard-Interbay neighborhoods.

J. The Alliance, the City, WSDOT and County (the Parties) are entering into this Agreement to fully resolve any dispute over the adequacy of the AWPOW FEIS.

AGREEMENT

I. Construction Mitigation and Immediate Changes to AWPOW

1. The City and the State agree to allow public access to the "Habitat Bench" as generally depicted in Figure 2-3 of the FEIS in accordance with a construction easement and future lease agreement between the City and State. Access will be available to members of the public during operating hours established by the Seattle Department of Parks and Recreation, through a gate that will be built as part of the Habitat Bench immediately north of the Washington Street Boat Landing depicted on Figure 2-3 of the FEIS. The City will be responsible for maintaining public access to the Habitat Bench. The City and the State will negotiate the timing and responsibility for construction of the Habitat Bench, but agree to make it accessible to the public by the end of 2022. "Operating hours" for the Habitat Bench will generally be the same as for other city parks for which the Seattle Department of Parks and Recreation establishes operating hours and hours

of closure, but not less than sunrise to sunset. The City and State, in collaboration with the Alliance, agree to work together to establish an operating plan for the Habitat Bench, which must meet the Seattle Ferry Terminal's public safety and security requirements, and that will address operating hours and other considerations.

The City, State, and Alliance further agree that public access to the Habitat Bench will not cause the Habitat Bench to be treated as a public recreational facility for the purposes of section 4(f) of the Transportation Act, 23 U.S.C. §138, and that the Habitat Bench will be developed as a joint development, as set out in 23 C.F.R. §774.11(i).

2. The City will increase funding for east/west connections in Pioneer Square from approximately $12M to a total of $20M. The Parties recognize that the future source of this additional funding will be the proposed Waterfront LID, which will be subject to more review and input from stakeholders in Pioneer Square and elsewhere in Center City and will require approval of the Seattle City Council. The additional funding will be used to implement pedestrian improvements, of like kind to those planned for S. Washington Street and S. Main Street and described in Section 2.3.4 of the FEIS, to Yesler Way, S. Main Street, S. Washington Street and S. King Street, and will extend from Alaskan Way to Second Avenue, to the extent feasible. The City and Alliance, with input from the neighborhood stakeholders, will collaboratively analyze on a block by block basis how to best leverage city dollars with planned private investment so as to maximize the benefit of those street improvements to Pioneer Square as a whole. The City and Alliance acknowledge that historic preservation requirements related to the preservation/reconstruction of areaways could significantly add to the cost of these improvements and will work together to address that issue.

3. Beginning 6 months prior to the anticipated start of waterfront construction until the end of significant construction of AWPOW, City will pay to Alliance $75,000 annually, pro-rated as appropriate, to allow Alliance to fulfill construction coordination and communication functions in collaboration with public partners. The Alliance will provide status reports at reasonable intervals and containing relevant information, as agreed to by the Alliance and the City and memorialized in a memorandum of agreement. This support is intended to ensure an effective interface between the City, WSDOT and County, on the one hand, and property owners and tenants within Pioneer Square, on the other hand, to help ensure that construction of AWPOW does not render properties within Pioneer Square inaccessible or uninhabitable for their usual purposes, and to minimize the construction impacts on owners and tenants and their customers within Pioneer Square. For purposes of this Section I.3 and Section I.4, below, the "end of significant construction" shall be the date on which all construction of Alaskan Way and the east/west connections improvements described in Section I.2 above has been completed (other than improvements which based on the process in Section I.2 the Parties decide will be implemented by adjacent private properties), and all restrictions on any streets within Pioneer Square due to construction of AWPOW have been eliminated.

4. From the start of waterfront construction until the end of significant construction of AWPOW, the City and State will fund the extension of existing low-rate parking agreements with off-street parking operators at the First and Columbia and Butler Garages that acquire the right for short-term parkers to park off-street at the City's on-street parking rate. The City, State, and Alliance recognize that meeting this commitment is contingent on reaching reasonable terms with these parking operators generally consistent with existing low-rate parking agreements. For purposes of this provision, "short term" parking is parking for 4 hours or less.

5. Until ST 3 reaches the Alaska Junction Station (or if final design changes the plan as presented to voters in 2016, to the nearest station to what was shown as the Alaska Junction Station in 2016), Metro estimates that it will operate not more than 650 buses per day on Alaskan Way south of Columbia Street, provided, however, that when the City of Seattle has completed the Lander Street Overpass, the Parties and other stakeholders, including the Port of Seattle, will convene to review travel time and reliability data since the opening of the SR 519/Alaskan Way surface street as part of AWPOW. This data will be used to look for possible opportunities for route adjustments and improvements and the Parties may make recommendations to the County Executive, Mayor, and City Council. Any route adjustment or improvements will be subject to King County Code Section 28.94.020 as currently adopted or hereafter amended.

II. Final Conditions

1. When the extension of Sound Transit Light Rail to the West Seattle Alaska Junction Station (or, if final design changes the plan as presented to voters in 2016, to the nearest station to what was shown as the Alaska Junction Station in 2016) is completed and open to service, Metro will, subject to King County Code Section 28.94.020 as currently adopted or hereafter amended, reduce bus volumes on Alaskan Way south of Columbia Street and on Columbia Street, west of Third Avenue, to not more than 195 buses per day, or 30% of the currently estimated total of 650 trips per day. Upon commencement of the Sound Transit Light Rail operations to West Seattle, the Parties and other stakeholders, including the Port of Seattle, will convene to evaluate the corridor's overall function along with the location of bus stops and signage, along the SR 519/Alaskan Way surface street and Columbia Street, and may make recommendations to the appropriate governing bodies or executives regarding opportunities for adjustments and improvements.

2. Within fifteen (15) months of the opening of the Alaska Junction Station of Sound Transit Light Rail service to West Seattle, the City will retrofit SR 519/Alaskan Way between Yesler Way and South King Street to narrow Alaskan Way by eliminating the transit lane on each side of Alaskan Way, and converting the area of the former transit lane to sidewalks, landscaping, and on-street parking identified in the FEIS or other uses (Alaskan Way Retrofit), subject to approval by WSDOT for the sections of the roadway that are within the SR 519 right-of-way, and taking into account the recommendations made under paragraph II.1. The Alaskan Way retrofit shall generally conform to the "Future 2030 5/6 Lane Configuration" shown on two

sets of plans titled "Southend Alaskan Way 2030 Narrowing Concept," attached hereto as Exhibit A. The Alaskan Way Retrofit will be funded by the City and will require final budget authorization by the Seattle City Council for the Alaskan Way Retrofit at that time. The Alliance, the State, and the City will review the planned placement of street trees on the east and west side of Alaskan Way as part of AWPOW to ensure they do not conflict with this commitment. Beginning up to 5 years prior to the scheduled opening of Sound Transit Light Rail service to West Seattle, the City will work with WSDOT, the Port of Seattle, the Alliance, and Pioneer Square property owners and tenants on the design of the final configuration of Alaskan Way, generally consistent with the final configuration shown on Exhibit A.

3. Once the Alaskan Way Retrofit described in Section I.2 above is completed, and taking into account the recommendations from Section II.1, the City will allow general purpose traffic movement on Columbia Street in both directions, between Alaskan Way and Third Avenue, to facilitate local access and will maximize opportunities to restore parking, loading and building access that were reduced as part of changes directing Metro buses onto Columbia Street.

III. Effective Date and Dismissal of Appeals of FEIS

1. This "Agreement Regarding AWPOW" ("Agreement") will be ratified by ordinances passed by the Seattle City Council and signed by the Mayor of Seattle, and by the King County Council and signed by the King County Executive. The form of the ordinances will be approved by the Seattle City Attorney, the King County Prosecuting Attorney's Office and counsel for Alliance prior to their adoption. The Effective Date of this Agreement will be the date when the last of the actions required by this Section III.1 has occurred.

2. From the date this Agreement is signed by all Parties until the Effective Date, all proceedings before the Seattle Hearing Examiner or in Superior Court will be stayed. Within two business days following the Effective Date of the Agreement, Alliance will move to dismiss its appeal to the City Hearing Examiner of the adequacy of the FEIS, and will move to dismiss King County Cause No. 17-2-01514-8 SEA.

IV. SEPA Compliance

1. Alliance stipulates and agrees that so long as the LID, if formed, includes the funding and improvements generally described in Section I.2, above, the Alliance will support having costs associated with implementing those provisions included in the LID, and work with other Center City stakeholders to advocate for their inclusion in the LID.

2. Alliance stipulates and agrees that the changes in AWPOW called for by this Agreement, including the additional investments in east/west connections called for in Section I.2 above, will

have no significant adverse impact on the environment and that it will take no steps to challenge any amendment to AWPOW that is consistent with this Agreement based on SEPA.

V. Miscellaneous Provisions

1. This Agreement may be signed in counterparts.

2. This Agreement may be amended by the Parties so long as all Parties agree to the amendment in writing.

3. Nothing in this agreement supersedes WSDOT's responsibilities under state law, including Title 47 RCW. If any portion of this Agreement is found to be invalid or unenforceable, the remainder shall be valid and enforceable so long as the overall purpose of the Agreement can be achieved.

4. The Parties agree that they will comply with their obligations under this Agreement. Should any party fail to comply with their obligations, the others will have no adequate remedy in damages and will be entitled to an injunction enforcing this Agreement.

5. Alliance agrees that it will not file any local, state, or federal administrative appeal, state or federal judicial appeal, or any appeal or lawsuit of any other kind challenging any governmental permit or approval related to AWPOW, unless there is substantial modification to AWPOW as it is currently proposed and described herein. The parties agree to negotiate in good faith to amend the terms of this Agreement, as needed, to address any issues related to any substantial modification. Any opposition, shall be limited to the impacts associated with any substantial modification. For purposes of this paragraph, "substantial modification" does not include modifications reasonably required or necessary to implement the purposes of this Agreement. Notwithstanding the foregoing, Alliance shall be entitled to take any administrative or legal action it deems appropriate or necessary to enforce the terms of this Agreement.

Agreed:

ALLIANCE FOR PIONEER SQUARE

By Leslie G. Smith
Its Executive Director

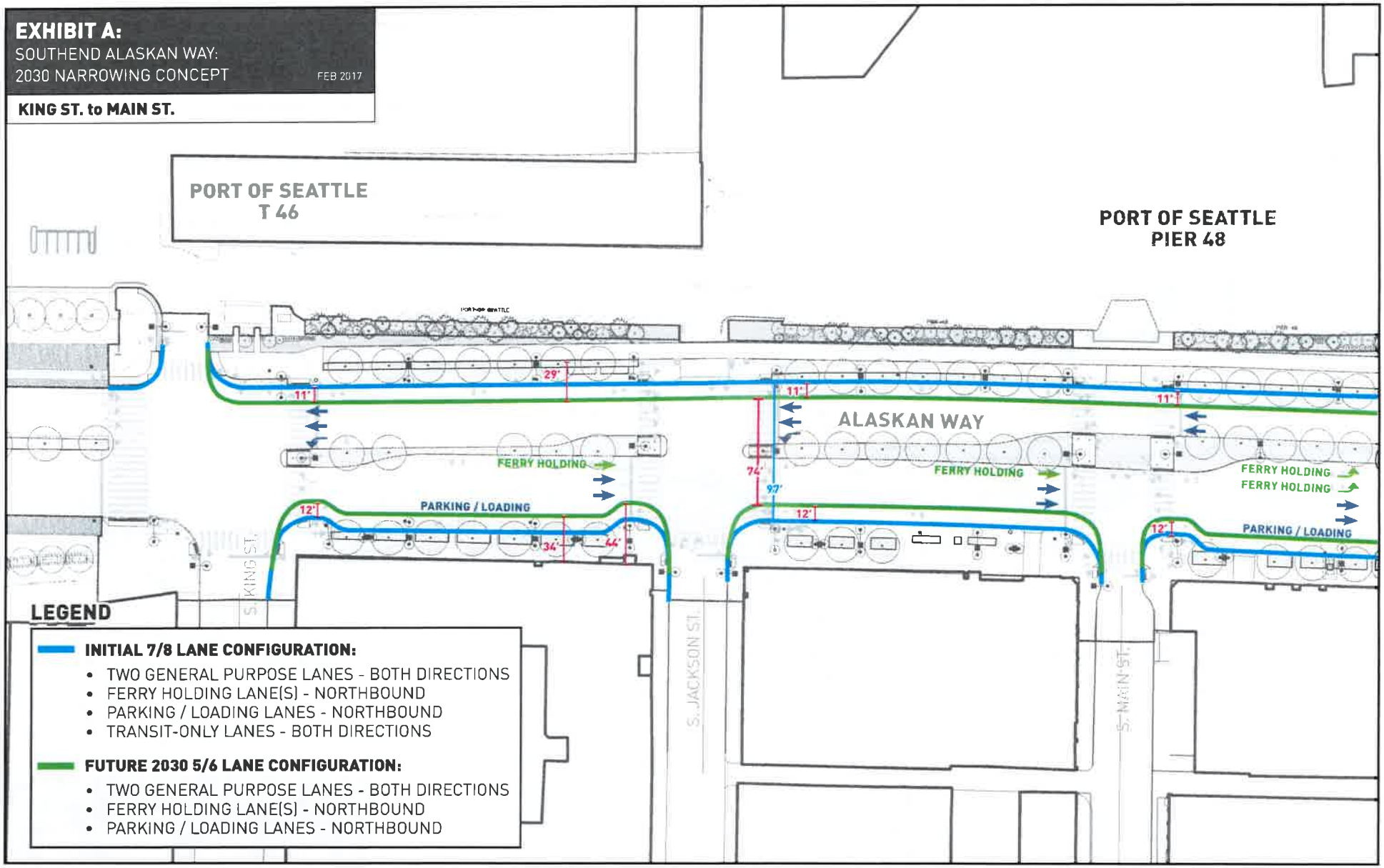
EXHIBIT A:
SOUTHEND ALASKAN WAY:
2030 NARROWING CONCEPT
FEB 2017
KING ST. to MAIN ST.
PORT OF SEATTLE
T 46
PORT OF SEATTLE
PIER 48
ALASKAN WAY
29'
11'
11'
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S. KING ST.
S. JACKSON ST.
S. MAIN ST.
LEGEND
INITIAL 7/8 LANE CONFIGURATION:
• TWO GENERAL PURPOSE LANES - BOTH DIRECTIONS
• FERRY HOLDING LANE(S) - NORTHBOUND
• PARKING / LOADING LANES - NORTHBOUND
• TRANSIT-ONLY LANES - BOTH DIRECTIONS
FUTURE 2030 5/6 LANE CONFIGURATION:
• TWO GENERAL PURPOSE LANES - BOTH DIRECTIONS
• FERRY HOLDING LANE(S) - NORTHBOUND
• PARKING / LOADING LANES - NORTHBOUND

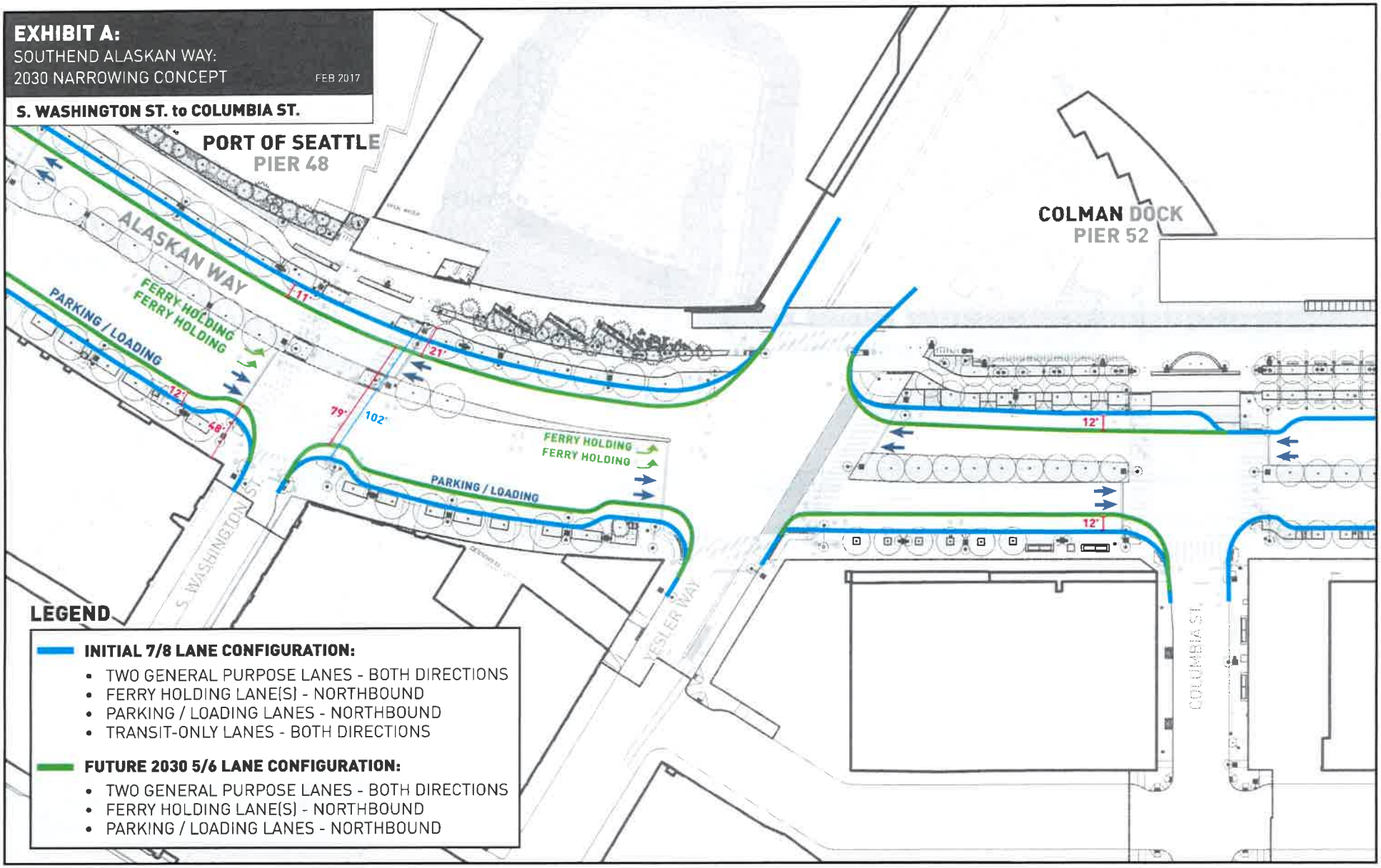
EXHIBIT A:
SOUTHEND ALASKAN WAY:
2030 NARROWING CONCEPT
FEB 2017
S. WASHINGTON ST. to COLUMBIA ST.
PORT OF SEATTLE
PIER 48
COLMAN DOCK
PIER 52
ALASKAN WAY
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FERRY HOLDING
PARKING / LOADING
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S. WASHINGTON ST
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COLUMBIA ST
LEGEND
INITIAL 7/8 LANE CONFIGURATION:
TWO GENERAL PURPOSE LANES - BOTH DIRECTIONS
FERRY HOLDING LANE(S) - NORTHBOUND
PARKING / LOADING LANES - NORTHBOUND
TRANSIT-ONLY LANES - BOTH DIRECTIONS
FUTURE 2030 5/6 LANE CONFIGURATION:
TWO GENERAL PURPOSE LANES - BOTH DIRECTIONS
FERRY HOLDING LANE(S) - NORTHBOUND
PARKING / LOADING LANES - NORTHBOUND

Sound Transit Projects - Communications (1 Total)

Search Term

557364

Communication ID: 557364 - GREAT for All Coalition BLE Scoping Comment

Communication (12/9/2024)

GREAT for All Coalition BLE Scoping Comment

GREAT for All in the CID is a coalition of individuals who are concerned about Sound Transit's plan to build a lightrail station in or around the Chinatown International District.

We are in favor of the North and South Preferred Alternative, however, we are concerned about and would like the DEIS to explore:

what the traffic reroutes for all options will be like? how many additional cars will be driving through which streets? will trucks be re-routed, too? can you guess ratio between trucks and sedans/SUVs? what will that added pollution do the kids who live here, to the elderly, too? can a detour routing through Maynard Ave S even be possible between Weller and King? It gets to be a one lane road during and around lunch and dinner time. how will reroutes impact the pedestrian safety, and how will that harm be mitigated without changing the walkability of the neighborhood?

What would construction noise be like? Usually how many people relocate at the start of or during the duration of construction? In which build option will construction noise and pollution affect residents the most?

how will regular and special events (Seahawks games, when the Mariners get to the World Series?) affect the neighborhood before, during, and after each phase of the construction?

how much assistance can small businesses affected by the construction pressures receive? will Sound Transit provide mitigation in a timely manner? can Sound Transit help those displaced by any other fiduciary means (possible exploring more lines of credit to help with a relocation)? can Sound Transit provide consultants to meet with owners and employees about next steps or strategies to ease stress or change in routine/logistics?

Can we look into adding a water feature to any of the design options. Climate change is real, so we can build more green spaces and shade into the design options?

Please, an important item to consider while trying to answer what y'all need to answer: how will build options impact those who currently live, work, or play here.

Thanks for your detailed investigation to our inquiries and concerns,

GREAT Coalition

It's a neighborhood because we're a community.
We got to care of each other.

Owner(s):

Contact ID	Name	Type	Phones	Email
1112217	GREAT for All Coalition	Organization		

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INTERIM CDA
InterIm Community Development Association

Ballard Link Extension
401 S. Jackson St. Seattle
WA 98104

InterIm CDA's Comments on the BLE Pre-Scoping Period

To whom it may concern:

InterIm CDA is a community-based nonprofit 501(C3) community development organization. We are rooted in the Chinatown-International District (CID) and offer community based real estate services, housing services, and programs to predominantly immigrant/refugee, API, and other low-income communities. Our work is done through the lens of Equitable Development; we want our communities to participate in and benefit from the neighborhood's growth.

As Sound Transit is in the scoping process to decide the Ballard Link Extension's preferred station placement, our organization has considerations that should be taken into account during the station selection process and prioritized during the Environmental Impact Statement research process.

The preferred station alternative should limit disruption to the day-to-day lives of neighborhood residents and small businesses during construction, preserve the identity of the CID, limit and mitigate long term impacts, and have built-in tactics to divert Stadium traffic away from the CID.

The CID is a working-class, culturally and linguistically sensitive, mixed-use neighborhood. This is a place where the needs of residents, commerce, and services collide. There are many individuals living in senior housing, big families with kids, and other community residents in the community. Folks hang out in third spaces like parks, the community center, community garden, and have conversations on the sidewalks. The creation of a community identity relies upon individuals sharing physical public spaces with one another. The inevitable noise and air pollution that construction brings will affect the identity of the neighborhood by creating an unsuitable environment that makes existing in these spaces unpleasant, driving people indoors. It is important that the construction's impact on third spaces and housing units is measured and taken into consideration.

The CID is a predominantly pedestrian neighborhood as most residents walk or take the bus as their main form of transportation. It is critical to measure the way construction can affect walkability in the neighborhood. The station option that diverts more cars into the

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CID means certain intersections will become more dangerous or congested. Forcing residents to cross large intersections without pedestrian safety infrastructure (signals or lighting, clear crosswalks, or alternative pathways/sidewalks) is dangerous and should be noted in the pre-scoping research. Bus lines or the streetcar being redirected can affect the ease of individuals accessing resources like the food bank or health services. For many folks, the bus or streetcar is their only access point to leaving the neighborhood. Any potential changes in public transportation lines should be researched.

Small businesses like cultural grocery stores, tea shops, and restaurants are critical to the functioning of residents. Forced closures or disruptions to these small businesses can be incredibly harmful: technical disruptions (pipes, electricity, water), environmental disruptions (dusty air, noise), and accessibility disruptions (blocked off alleys, sidewalks) could mean the permanent closure of important community resources. The proximity of construction to these resources and the potential for closing or disrupting the operation of these businesses should be researched. Similarly, if there is a forced closure of a business, there needs to be a compensation plan that allows for community negotiation and future opportunities for the business.

The CID deals with the brunt of traffic influx when there are stadium events which creates traffic issues and an influx of non-residents into the neighborhood. It is imperative the preferred station options are built in areas that will not worsen traffic from the games over the next twenty years. Similarly, if traffic redirections are necessary, it is important that they are diverted away from the CID. We want to ensure that small businesses existing in the neighborhood prioritize serving the residents and other community members, not pander to the large group of non-residents that are only in the neighborhood during sporting events.

The construction of the preferred station alternative should not only minimize its impact on the lives of CID residents but also consider outcomes that prioritize opportunities for the CID to grow and create pipelines for community ownership. The CID has not had an opportunity to expand in many years – if the preferred station alternatives are on the outskirts of the neighborhood, it can create the opportunity to expand the neighborhood with low-income housing, green space, and small businesses. Similarly, a station alternative that creates more affordable housing options or land that can be potentially put into a community land trust can create opportunities for community ownership. If Sound Transit is going to use the CID as a landing pad for construction of these stations, there

should be benefits for the neighborhood and residents that center opportunities for better living and ownership.

It is also critical that the information distributed in the pre-scoping period, particularly in Sound Transit's community outreach, contends with a robust model of displacement that allows community members to understand how each station option could potentially affect their lives. This includes an analysis of indirect displacement which examines economic displacement (caused by rising rents and costs of living which force people to relocate) and cultural displacement (where people chose to move because the neighborhood no longer supports a critical mass of culturally related businesses and institutions that serve them). Realistically, indirect displacement will happen past the construction period. It would be helpful to residents in their decision-making input about the preferred station alternative to see potential impacts 5, 10, even 20 years beyond the construction period.

Ultimately, **we support the North-South station option as the preferred alternative**, but the considerations listed above should guide the decision-making process of Sound Transit. We are aware that the 5th avenue diagonal option is being reconsidered, and we want to emphasize the destruction to the community and cultural landmarks that construction plan would cause. The 5th avenue option should be discontinued; it disrupts the heart of the neighborhood.

As Sound Transit continues the BLE, we are appreciative of your consideration of our input in this process. We want to ensure community needs are prioritized, particularly that their day-to-day lives are not significantly impacted, there is a plan for community benefits, and that residents are aptly informed of the potential impacts of the new transit stations. Please contact Stephanie Zhang at szhang@interimcda.org with questions.

Sincerely,

Leslie Morishita
Interim Co-Executive Director

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HISTORIC SEATTLE
Educate Advocate Preserve

OUR PROPERTIES

Good Shepherd Center
Built: 1906 | Operated by Historic Seattle since 1975

Mutual Life Building
Built: 1890-1916 | Operated by Historic Seattle since 1983

Belmont/Boylston Houses
Built: 1893-1903 | Operated by Historic Seattle since 1989

Phillips House
Built: 1902 | Operated by Historic Seattle since 1992

Victorian Row
Built: 1891 | Operated by Historic Seattle since 1993

Dearborn House
Historic Seattle Headquarters
Built: 1907 | Operated by Historic Seattle since 1997

Cadillac Hotel
Built: 1898 | Operated by Historic Seattle since 2001

Washington Hall
Built: 1908 | Operated by Historic Seattle since 2009

Garden House
Built: 1886 | Operated by Historic Seattle since 2021

Good Arts Building
Built: 1889 | Operated by Historic Seattle since 2022

1117 Minor Avenue
Seattle, WA 98101

(206) 622-6952
info@historicseattle.org

December 9, 2024

Via Email to: ballardlink@soundtransit.org

Ballard Link Extension
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Re: Historic Seattle DEIS Scoping Comments for Ballard Link Extension

Dear Ms. Swift:

On behalf of Historic Seattle, I am submitting these DEIS scoping comments on the Ballard Link Extension (BLE) Project as it relates to Sound Transit's preferred stations in the Chinatown-International District (CID) and Downtown. We submitted earlier comments on the WSBLE to the Sound Transit Board in February 2023. We have similar concerns now as we did in 2023.

Established in 1973 as a preservation development authority, Historic Seattle is the only citywide nonprofit dedicated to saving meaningful places to foster lively communities. Historic Seattle supports the light rail extension to Ballard and strongly believes that linking more communities to the existing light rail system will be a great public benefit.

However, after slowing down the process and further studying station alternatives and their possible impacts to downtown communities, we believe Sound Transit's preferred alternative as it relates to the CID and Downtown (Midtown station) will still result in adverse impacts to cultural and historic resources.

Historic Seattle offers the following comments:

5th Avenue Diagonal: This alternative would result in the demolition of buildings in the Seattle Chinatown National Register Historic District and local International Special Review District and forever change the physical character of the CID, displace small businesses and their associated owners and employees, and result in both short-term and long-term economic impacts to the neighborhood. Organizations from the community and many others have commented at length in opposition to a 5th Avenue alternative. Was this option studied further in the last year? This alternative will pose risks to the cultural and economic vitality of the CID, a neighborhood that continues to be threatened by external factors. This option ignores the significance of historic buildings from the modern era. Demolition cannot be mitigated. *Historic Seattle does not support this option.*

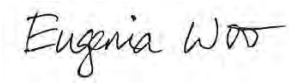
Dearborn Street: We believe this was previously called the South CID station and is now the preferred alternative. This station location is on the southwest edge of the CID and would not serve the community as well. A station located so close to the historic former INS Building (now known as Inscape Arts) will adversely impact the historic building and the community of artists who uses this space to produce and create culture. The INS Building is a contributing resource to the International Special Review District, listed individually on the National Register of Historic Places, and designated as a Seattle Landmark (as of summer 2024). Historic Seattle submitted the landmark nomination for the property in 2023. The DEIS should look closely at the potential impacts to this significant historic and cultural resource and consider meaningful mitigation if this site is chosen as a station. *Historic Seattle does not support this option.*

Midtown: We believe this was previously called the North CID station, but it is not actually in the CID or in Pioneer Square. Whatever its current name is, we oppose building a station in this location if it results in the demolition of the National Register of Historic Places-eligible King County Administration Building (as identified in the field survey for the DEIS for the WSBLE project). We believe it's also eligible for Seattle Landmark designation. A nomination for both the National Register of Historic Places and for Seattle Landmark designation should be submitted as part of the process. We note that the King County Civic Campus Initiative and BLE materials all show the King County Administration Building removed from any maps and plans as if it's a done deal. Demolition cannot be mitigated. *Historic Seattle does not support this option.*

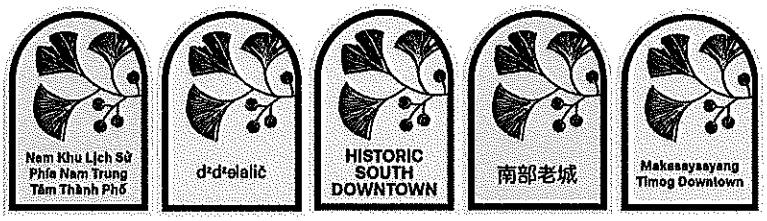
4th Avenue Shallow or 4th Avenue Shallower: We are on record as supporting this alternative in 2023 and we still support this alternative. While it's not perfect (nothing is especially for a project like this), these options have the least impact in the CID community and historic district and is supported by many community members who have consistently called for a station that is accessible, well-connected, and contributes to community vitality.

Thank you for the opportunity to comment. We hope to see meaningful consideration of adverse impacts on historic and cultural resources in the DEIS. Resources from the modern era should not be ignored, dismissed, and assumed disposable.

Sincerely,



Eugenia Woo
Director of Preservation Services
eugeniaw@historicseattle.org



HISTORIC SOUTH DOWNTOWN

6 December 2024

Lauren Swift
Sound Transit
401 S Jackson St
Seattle WA 98104

SENT VIA ELECTRONIC MAIL

Dear Ms. Swift:
This letter is submitted on behalf of the Pioneer Square International District Community Preservation & Development Authority (dba Historic South Downtown, hereinafter HSD). HSD appreciates the opportunity to submit input on the scope of the new environmental impact study for the Ballard Link Extension, separated from the 2019-2023 West Seattle Ballard Link Extension project. HSD was created in 2007 specifically to help elevate community voices and community needs in large scale public projects like Ballard Link Extension.

We maintain that the original purpose and need, as stated in the 2022 WSBLE DEIS, is adequately articulated, and we continue to agree with and support its goals. Equitable access to transit is key to Pioneer Square and Chinatown International District, historic neighborhoods originally developed around changing transportation systems that demonstrate that "transit-oriented development" is a proven, century-old neighborhood development pattern that we should emulate, while also sustaining and preserving the existing neighborhoods.

Extended Comment Period
In 2022, the comment period was extended to 90 days to recognize the complexity of this project but also the challenges of engaging some sectors of Seattle's communities. We request at least a 90-day comment period for the forthcoming Ballard Link Extension DEIS. Additionally, we ask that translated materials be provided at the outset of this comment period, along with resources for language access throughout the process.

Alternatives To Be Studied
The heart of an EIS is its comparisons of alternatives, its identification of the significant adverse impacts of various alternatives, and its identification of potential means of mitigating the adverse impacts of a proposal. This EIS is complicated by the prior scoping of 4 alternatives for the CID segment of the line, the addition of 1 alternative to the original 2022 WSBLE DEIS, the 2023 determinations by the board that 4 of those original alternatives were infeasible or undesirable, and during Further Studies, the introduction of 1 additional alternative that also affected the southernmost Downtown segment station, Midtown. This final alternative was determined by the Board to be the "preferred." A thorough EIS is one which studies a full range of *reasonable alternatives* and identifies the trade-offs and benefits of one alternative over another, as well as the means to mitigate the adverse impacts of the alternative that is ultimately chosen.

West Seattle Link Extension: We request that the choices made for the SODO station through the West Seattle Link Extension process, and their impacts on Pioneer Square and Chinatown International District for construction traffic, property acquisitions, and potential alignments, be fully addressed when discussing alternatives and cumulative impacts in the upcoming BLE DEIS. Sound Transit's decision to separate the two light rail projects moves the WSLE project's foreseeable impacts during construction and operations into the cumulative impacts for the Ballard project.

For the alternatives identified as CID-2b and CID-1b [5th Ave Deep, 4th Ave Deep]: We ask that the new/revised/supplemental EIS address the reasons that these alternatives proposed in 2019-2022 are now considered infeasible or undesirable.

For the alternatives identified as CID-2a [5th Ave shallow and 5th Ave Shallow Diagonal]: We believe that the community clearly stated its objections, which were acknowledged by the Board, and we do not wish to re-litigate the catastrophic impacts of these alternatives. The Board acknowledged these impacts, and no information was shared on these alternatives between October 2022 and November 2024. If Sound Transit wishes to advance this alternative, our questions and concerns were identified in our 2022 DEIS comment letter, attached as appendix B.

If, as the Board indicated in February and March 2023, CID-2a is infeasible, it should not be used as a baseline for comparing costs or impacts.

For the alternative identified as CID-1a [4th Ave Shallow]: We ask that the additional studies from 2023 and 2024 be integrated into the new DEIS, with appropriate comparative assessments done between the viable alternatives. Additionally, the discrepancies within City of Seattle documentation with regards to the 4th Ave South viaduct's status need to be reviewed and clarified – if, as the 2015 Move Seattle Levy's project list indicated, the viaduct needs to be replaced, that project must be included in the known projects list when cumulative effects are assessed.

For the preferred alternative, which has been known as South of CID/Dearborn Street station, and North of CID/Midtown (2023): Because we have spent two years with Sound Transit staff presenting this station couplet as an alternative to the CID-1a 4th Ave S station option, we ask that comparisons between the preferred alternative and the 4th Ave S/Midtown (DT-1) station options be provided. Our communities have dedicated two years working with Sound Transit staff on these options. We would like to compare and clarify tradeoffs between these couplets and need continuity in the presentation of information.

We additionally request that a ridership and connectivity comparison between South CID/Dearborn + North CID/Midtown (2023) be compared with South CID/Dearborn + Midtown (DT-1) be included, focusing on connectivity with First Hill. In Seattle, First Hill hosts an important concentration of health care services and as such it is important to our community members and to transit riders within the system. With the completion this year of Rapid Ride G, which the Midtown (DT-1) station was intended to connect to, we wish to understand the tradeoffs between the two potential Midtown station location options before a final decision is made.

In keeping with the purpose and need to expand mobility for the corridor and the region's residents, which include transit-dependent people, low-income populations, and communities of color, we wish to see the impacts of different alternatives selection on ridership from

equity-seeking groups. We request transit integration modeling, ridership modeling, and an equity assessment done in the same model as the work done by Sound Transit staff for the 7/27/23 Denny Station Status Report for the Board of Directors, slides 16-25, and 38, for the CID 4th, North CID/Midtown(2023), and South CID/Dearborn stations.

For the South CID/Dearborn Street station: we ask that the DEIS address the City's need to rezone the parcels if residential TOD or eTOD is to be allowed on the site. The South CID/Dearborn station location was rezoned as part of the Maritime and Industrial Rezoning of 2022. Selecting this site for a station may be allowable under this current zoning, but Sound Transit has promised equitable TOD that would include residential units. A foreseeable impact of this potential mitigation is a need to rezone the land, so if eTOD that includes residences is proposed, the impacts of this rezoning process should be included.

Haul routes along Dearborn to I-5 will affect air quality and cause noise to sensitive populations along that route. This impact must be analyzed and appropriate mitigation measures identified, if possible.

Mitigating the impacts on the artists in the INScape Arts building, a National Register-listed historic building with significant cultural, historic, and architectural features directly adjacent to the construction zone, along with protections for the building itself, should be addressed in the DEIS.

Additionally, we suggest that Sound Transit consider the Urban Design Framework that was accomplished for the Capitol Hill Station as a model for managing community input for and mitigating the impacts of a new station and surrounding TOD. A UDF could be used to establish a process for eTOD, and to lay out current considerations for suitable uses of the site. City adoption of this UDF would help the solidify community input in the future development.

For the North CID/Midtown (2023) station: This station location will affect a vulnerable population not identified or studied in the 2022 DEIS. The station location is surrounded by social and public services, as well as transitional and supportive housing. The effects on these programs, the populations they serve, and the feasibility of finding other suitable and sustainable locations, not just the economics of relocation, must be part of the due diligence for this EIS.

The County has proposed a full relocation of their Civic Campus from the location of this station to south of the South CID/Dearborn station, to support the North CID/Midtown station option. This relocation would affect both station locations, as well as the neighborhoods adjacent to them – Downtown, Pioneer Square, Chinatown International District, and SODO. The cumulative impacts of this transportation project and an associated, adjacent County Civic Campus relocation, should be considered under the Cumulative Impacts section of the EIS.

South Downtown Hub

For all options, Sound Transit has been working with the City of Seattle to study activation of the area around Union Station, extending the former "Jackson Hub" area to a larger "South Downtown Hub" that now stretches from the North CID/Midtown (new) station option at 5th and James to the South CID/Dearborn Street station option at Dearborn and 6th Ave. As the goal of some of this study was to identify ways to provide better connectivity between the existing light rail stations and proposed new ones, this is mitigation by design, and the elements of the Hub

projects that will be undertaken by Sound Transit as part of the project should be clearly identified with cost estimates and transit connectivity studied.

All transit riders are pedestrians for at least part of their commute. The current preferred alternative for the CID segment and the southernmost Downtown segment stations require transit riders to spend little more time as pedestrians, walking from station to station. As such, addressing pedestrian infrastructure for transfers and last mile connectivity will be a key part of station design and mitigation of the choices of more distant station locations. More specific infrastructure projects must be designated to make these stations work for riders. The City and Sound Transit should come to early binding agreements about shared responsibilities. Too often, CID and Pioneer Square infrastructure projects get delayed because of the complicated shared responsibilities of literally every transit option in town meeting here – *unsecured promises to work together are inadequate mitigation for this project.*

Overall Study Areas Identified as Inadequate in 2022 DEIS for WSBLE
The new alternatives have changed the Area of Potential Effect and likely changed the historic and archaeological resources that must be considered under Section 106 of the NHPA. We look forward to reviewing the new APE.

Stadium and other surge events must be studied for their impacts on traffic, both during construction of BLE and during operations far into the future. While the stadiums work to be good neighbors, the City and Sound Transit must work with them to understand the impacts of large events on neighborhood traffic.

The community and economic impact studies looking at small businesses need to recognize that Pioneer Square and Chinatown International Districts are unique commercial ecosystems with place-based businesses that cannot be relocated without grave harm. Small locally-owned businesses are character-defining features of both small business districts, and they have suffered cumulative impacts from many construction projects (particularly Pioneer Square) and from pandemic-related impacts (particularly CID with racist violence).

One of the core reasons for HSD to exist is to advocate for the people and businesses that have built and continue to make Pioneer Square and Chinatown International District thriving and beloved neighborhoods in Seattle. We strongly believe that major projects like BLE must serve those who live and work in the area now, as opposed to creating opportunities for large-scale new developments or redevelopments that will displace current people and businesses, and make it harder for the low-income communities to find their place in the future.

Gentrification is not a net-benefit to either district, as identified in the 2022 DEIS. Increased displacement risks for our residential and commercial tenants is a foreseeable, negative impact. Public safety both for construction and long-term operations will be impacted and should be addressed by the DEIS. Sound Transit must do better to compile a list of City-funded projects that will also impact south downtown during BLE construction or will foreseeably follow BLE construction like promised TOD construction, new roads, or major redevelopment projects that are currently under consideration on the periphery of the BLE project. Community cohesion absolutely will be affected by construction; these impacts must be analyzed and mitigation proposed, if possible. The DEIS must adequately address quality of life and health impacts during construction and operations. This is fundamental in answering the question of whether the BLE helps or hinders land use policy goals.

Conclusion
HSD supports the extension of light rail to Ballard, fulfilling a key part of the Sound Transit 3 program approved by voters in 2016. This project carries the potential to create a more connected, accessible regional transportation hub in South Downtown Seattle, improving access for commuters using light rail, the Sounder, Amtrak, Seattle Streetcar, King County Metro, WSDOT Ferries, as well as the larger connected region. HSD supports this vision.

We expect Sound Transit to use its resources, which are far greater than the resources our local community organizations can access, to provide meaningful and effective community engagement through an extended DEIS comment period in 2025. We look forward to helping our community participate in the next phase of this project.

Sincerely,

Kathleen Barry Johnson
Executive Director
Historic South Downtown

Appendix A: 2019 scoping letter
Appendix B: 2022 DEIS Comment Letter
Appendix C: Ballard Link Extension: Denny Station status report to the Sound Transit Board of Directors, 7/27/2023

Appendix A

Kathleen Barry Johnson,
Executive Director

BOARD OF DIRECTORS

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March 27, 2019

Submitted via email to: WSBscopingcomments@soundtransit.org

West Seattle and Ballard Link Extensions, c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Re: Scope of the EIS for West Seattle and Ballard Link Extensions Project

Dear Ms. Swift:

This letter is submitted on behalf of the Pioneer Square International District Community Preservation & Development Authority (dba Historic South Downtown, *hereinafter* HSD). HSD appreciates the opportunity to submit input on the scope of the environmental impact study for the West Seattle and Ballard Link Extensions (West Seattle/Ballard Link) project.

ABOUT HISTORIC SOUTH DOWNTOWN AND OUR STAKEHOLDERS

HSD was created by the Washington State Legislature in 2007 in response to unprecedented impacts of ongoing construction of major public facilities, public works, and capital projects in and around the Pioneer Square and Chinatown-International Historic Districts. It was created to preserve, restore, and promote the health, safety, and cultural identity of Seattle's Pioneer Square and Chinatown-International District neighborhoods. It is governed by a board of directors elected to represent local government and business, residents, arts organizations, non-profits, and historic and cultural organizations from both neighborhoods.

Because of our focus on the vitality of the south downtown neighborhoods, Historic South Downtown and our stakeholder partners are keenly aware of the importance of the long-term nature of the work at hand. We view every decision to be made regarding the West Seattle/Ballard link as a 100-year impact decision. The result of this project must be viewed, in part, with how useful it will be to community members and commuters in 2135, as well as 2035.

The West Seattle/Ballard Link scoping period comes at a time when our communities have limited capacity to engage in the public process. Construction of SR99 Deep Bore Tunnel, Seawall, the Seattle Waterfront, and the Streetcar, as well as demolition of the Alaskan Way Viaduct has and will continue to cause disruption to the Pioneer Square neighborhood. The Chinatown-International District is still recovering from construction of the First Hill Streetcar and more than a dozen private construction projects in various stages of development. Both

neighborhoods face ongoing public construction impacts from sewer, water, and lighting system upgrades meant to benefit all of Seattle. Community members feel the burden of a hot economy and real estate market on rents and cost of living. On top of this, our neighborhoods—like urban neighborhoods across the U.S.—are grappling with the effects of rising homelessness and violent crime. All of this is taxing our resources and challenging our resilience.

It is essential that the EIS adequately recognize the nature of the affected environment. The purpose of this discussion is to ensure you fully appreciate the important characteristics of Pioneer Square and Chinatown-International District that may be affected by the West Seattle/Ballard Link project.

According to the U.S. Census, over three-quarters of the population of the Chinatown-International District and over 40 percent of the Pioneer Square identifies as minority (2012-2016 American Community Survey). Nearly 30 percent of the population in both neighborhoods have incomes below the federal poverty level (2012-2016 American Community Survey). The highest concentration of homeless people in King County is in Pioneer Square, with over 44 percent of the population homeless (2010 U.S. Census). In the three Census block groups that comprise the Chinatown-International District, 12 to 30 percent are seniors and 25 to 40 percent of households are linguistically isolated (2012-2016 American Community Survey).[1]

Data from the Chinatown-International District 2020 Healthy Community Action Plan (https://living-future.org/wp-content/uploads/2017/08/2020-CID-Healthy-Community-Action-Plan.pdf) shows that, when compared with other neighborhoods in Seattle and King County, the Chinatown-International District shows the highest rates of mental distress, diabetes, preventable hospitalizations, and poor housing conditions. According to the authors of the Chinatown-International District 2020 Healthy Community Action Plan, these complex health and social issues result from years of historic disinvestment and institutional racism.

Despite the challenges Pioneer Square and Chinatown-International District residents face, our neighborhoods have community cohesion, or linkages that neighbors feel to one another and community services, and resources to support them. For example, there are many health and human services providers throughout Pioneer Square and the Chinatown-International District, including: International Community Health Services (ICHS), Chief Seattle Club, Seattle's Union Gospel Mission Men's Shelter, Chinese Information and Service Center, Downtown Emergency Services Center, Compass Housing Alliance, Interim Community Development Authority, and Seattle Chinatown-International District Public Development Authority (SCIDpda). There are community gathering places where neighbors come together, including: Occidental Park, Hing Hay Park, the public plazas at Union and King Street stations, Donnie Chin International Children's Park, and the Danny Woo Community Garden.

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[1] *According to the U.S. Census Bureau, a linguistically isolated household is defined as a household in which no person age 14 and over speaks only English and no person age 14 and over who speaks a language other than English speaks English "very well".*

In addition to being home to vulnerable people, Pioneer Square and Chinatown-International District are the site of some of the most precious historic resources in Seattle. The Pioneer Square Historic District was one of the first districts to be listed on the National Register of Historic Places as a district, as well as containing many buildings that are individually listed on the National Register. Pioneer Square is "Seattle's First Neighborhood," home of its first major business district and the location of many of the significant events during its early history. Pioneer Square also housed the city's original Chinatown. The center blocks of Seattle's current Chinatown-International District were added to the National Register in 1986; the neighborhood also contains many individual buildings that are both city landmarks and listed on the National Register. Chinatown-International District as a whole has played a central role in the development of Seattle and the region, as it has been home to waves of immigrants from China, Japan, and other parts of Asia who have passed under the China Gate and claimed their version of the American Dream. It is essential that any significant public investment, such as West Seattle/Ballard Link, be designed and constructed to preserve, and not impair, the historic resources of these two historic neighborhoods.

Finally, the hard work of leaders within both communities has established a culture where a lively street-level environment with enticing shops and restaurants has encouraged business investment, attracted homeowners to live and work in the neighborhood, and generally maintained a "virtuous circle" in which the quality of one aspect of the neighborhood attracts the elements required to enhance other aspects of the neighborhood. But that virtuous cycle is both difficult to create, and fragile.

The EIS must fully analyze the impact of the design and construction of the West Seattle/Ballard Link on the larger qualities of Pioneer Square and Chinatown-International Districts, to ensure that in the name of providing mass transit, the Project does not damage the quality of two very important Seattle neighborhoods.

ALTERNATIVES TO STUDY IN THE EIS

We recognize the pressure Sound Transit is under to deliver on ST3 quickly. Promises made to voters obligate the agency to deliver faster than past light rail projects. This pressure appears to be driving a desire to narrow the alternatives to study in the EIS.

However, we believe that unduly narrowing the alternatives to be studied risks having the opposite of the desired effect; it would create a legally inadequate EIS, and risk causing several years of delay if the EIS were ultimately challenged and had to be redone. The heart of an EIS is its comparison of alternatives, its identification of the significant adverse impacts of various alternatives, and its identification of potential means of mitigating the adverse impacts of a proposal. When an EIS fails to examine potential alternatives, the primary purpose of the EIS is defeated. Sound Transit will get the West Seattle/Ballard Link finished and in service fastest if it prepares a thorough EIS now. A thorough EIS is one which studies a full range of reasonable alternatives and identifies the trade-offs and benefits of one alternative over another, as well as the means to mitigate the adverse impacts of the alternative that is ultimately chosen.

The region has recent experience with transportation planners insisting on unduly restricting the alternatives they considered in environmental documents. For years we were told that there were only two alternatives for replacement of the aging Alaskan Way Viaduct: a cut and cover tunnel or rebuilding the viaduct as a larger, more obtrusive version of itself. The first would have destroyed the historic piers along Seattle's Central Waterfront; the second would have perpetuated an historic land use tragedy for decades. Only after citizens insisted that neither of these alternatives were acceptable, eventually leading to a formal "no–no" vote, did planners seriously consider other alternatives. This led to a recognition that a third alternative—the deep bore tunnel now open to traffic—was the preferred alternative. The years of transportation planners insisting that there were only two alternatives and not looking further delayed the completion of the viaduct replacement for years, and resulted in tens or hundreds of millions of dollars of wasted design work. With that recent history, transportation planners are simply not credible if they declare that there is only one alternative that is viable and can be considered.

Under the best of circumstances, the West Seattle/Ballard Link project will be a massive project with massive impacts on the communities it affects.[2] HSD is concerned about the effects of any alternative—both during construction and in the long-term—on the many minority, linguistically-isolated, low-income, homeless, and elderly community members in Pioneer Square and the Chinatown-International District. Because the West Seattle/Ballard Link project will have substantial and lasting impacts on Pioneer Square and the Chinatown-International District and there is not yet enough information to understand and compare the potential impacts of different construction methods and alignments, <u>we believe it is premature to study only one preferred alternative in the EIS. Doing so would make the EIS inadequate from its inception.</u>

We also need to emphasize—we are a community organization of primarily volunteers, whereas Sound Transit is a multi-million-dollar organization staffed with engineers and planners. We expect Sound Transit to use its far greater resources to actively engage the affected communities as it identifies alternatives, the adverse impacts of each alternative, and potential mitigation for those impacts. We will be happy to work with Sound Transit to the extent we can in providing information about our communities and feedback on its work. But we cannot do the work for Sound Transit.

Based on information available to date, we believe the following options must be studied in the EIS, in addition to alternatives that Sound Transit might initially prefer:

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[2] *Quite apart from the disruption from the current major public and private projects that are affecting Pioneer Square and Chinatown-International District, the long-term effects of which cannot yet be predicted, Seattle has experience with the impacts of the construction of the Third Avenue Bus Tunnel in the 1980s. That construction contributed to, if not caused, the demise of one of Seattle's three department stores that anchored Seattle's retail core, Frederick & Nelson, as well as numerous smaller retailers, and created a dead zone along Third Avenue for more than a decade, eliminating the small retailers that had created street life and public safety, and replacing that formerly healthy urban ecosystem with some of the highest crime areas of downtown Seattle. The potential adverse impacts of construction of the West Seattle/Ballard Link must be analyzed based on Seattle's actual experience with similar projects.*

- Sound Transit must study a Fourth Avenue alignment in the EIS. Sounder, Amtrak, Streetcar, and existing light rail service converge at Fourth Avenue and S. Jackson Street. Because of this, HSD believes the Fourth Avenue alignment appears to be better positioned to meet our objectives of improving connectivity between the Pioneer Square and Chinatown-International District neighborhoods, and better connecting both to the region as a whole, by leveraging the opportunities that come with serving as a regional transportation hub.[3]
- As there is not yet enough detail to compare the impacts of construction methods, Sound Transit must study the following options for the West Seattle/Ballard Link alignment through the Pioneer Square and Chinatown-International Districts:
  - Cut-and-cover tunnel versus bored tunnel (tunnel construction)
  - Cut-and-cover station versus mined station (Chinatown-International District/Pioneer Square station)
- We also ask Sound Transit to evaluate multiple construction delivery methods—including new integrated delivery approaches—in the interest of expediting project delivery and minimizing impacts to the Pioneer Square and Chinatown-International District.
- Considering the best information currently available, HSD and the stakeholder signatories below are not able to support a Fifth Avenue alignment as the preferred alternative. Based on the information provided to date, we have serious concerns about the potential construction impacts of the Fifth Avenue alignment. As with each alternative, we have questions about the number of businesses and residents who would be displaced during construction and the potential impacts of construction on community members' access to health and human services, community resources, and small and minority-owned businesses. We also have questions about whether there is any mitigation that would be effective in meaningfully addressing these impacts. Until those questions are addressed, and the impacts of the alternatives are compared, it is premature to identify the Fifth Avenue alignment as being "preferred."
- Finally, there is a question of whether the "ST3 Representative Alignment" is a reasonable alternative that must be studied in the EIS. According to Sound Transit's Level 3 Alternative screening process, the ST Representative Alignment does not perform well against the level 3 screening criteria. While we have not encountered much public support for this alternative, we encourage Sound Transit to study all reasonable alternatives for this project. If Sound Transit chooses not to study the ST3 Representative Alignment in the EIS, it may be better to study another reasonable alternative yet to be determined.

SCOPE OF THE EIS

HSD requests the EIS include the following analyses:

Acquisitions, Displacements, and Relocations

According to the 2035 Seattle Growth and Equity report, the Chinatown-International District is at high risk for displacement of low-income, minority and vulnerable populations

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[3] The Jackson Hub Project Concept Report, currently in draft form but due to be finalized in early spring 2019, articulates these objectives. Attachment A includes a link to this and other land use studies and plans.

(https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/SeattlesComprehensivePlan/FinalGrowthandEquityAnalysis.pdf). The West Seattle/Ballard Link project could accelerate the rate of displacement during and after construction of the project. The EIS must analyze the impact of the Project on the displacement of low-income, minority and vulnerable populations during construction and in once the project is in operation, and identify mitigation for that impact. If in 2052—a decade after the design date of 2042—West Seattle and Ballard residents are enjoying routine and efficient light rail service to downtown but low-income, immigrant residents of Chinatown-International District cannot afford to shop or find access to needed services in their neighborhood and small, family-owned businesses have been forced out of a gentrifying community, the Project cannot be labeled a success.

Construction Impacts

Some public construction projects are simply one of the hassles of living in a progressive community that must be endured. But projects such as the West Seattle/Ballard Link are so fundamentally different in scale as to be different in kind. Significant impacts on Pioneer Square and the Chinatown-International District from the West Seattle/Ballard Link project are likely to arise from the construction process, and those impacts and potential mitigation require in-depth study. The impacts from construction on transportation, parking, noise, vibration, access to public and health services, and public safety can literally be matters of life and death for residents and businesses during construction. Adequate mitigation of construction impacts is also essential, and to be adequate, the EIS must identify the specifics of mitigation to be provided and the systems that will be put in place to monitor the effectiveness of the mitigation as construction proceeds. Sound Transit will need to provide adjustments if monitoring shows particular mitigation to be inadequate or ineffective. There are several neighborhoods in Seattle (The Historic Waterfront, Pioneer Square, and Pike Place Market, to name a few) who have recent experience with the highly disruptive Alaskan Way Viaduct and Elliott Bay Seawall Replacement Projects, the First Hill Streetcar construction, and the replacement of the First Avenue water main, where it was demonstrated that with adequate mitigation, construction impacts may not be fatal to the vibrant street experience that is the foundation for our neighborhoods' success. One specific example was the funding of parking assistance, including reduced-cost short term parking in area garages and programs to inform visitors where parking is available, commitments (which must be kept) to cease construction during critical visitor periods, and funding of community information personnel, so that there is a direct line of communication between the project and the community and so that businesses and residents get as much warning of disruption as possible and know how to communicate back to the project management. If at the completion of the West Seattle/Ballard Link, residents of West Seattle and Ballard have effective public transit to downtown but Seattle's Historic South Downtown is marked by "Space Available" signs in most windows, vacant housing units, and its most vulnerable populations have been forced out, the Project cannot be labeled a success.

It is also critical that the EIS consider the cumulative construction impacts of other public projects that take place before, during, or after the West Seattle/Ballard Link. These include:

- The 4th Avenue Viaduct replacement, which SDOT has indicated will need to be replaced in the foreseeable future
- Alaskan Way viaduct replacement
- Elliott Bay seawall replacement
- Waterfront Seattle program
- Washington State Ferry Terminal expansion
- Seattle Streetcar construction
- Convention Center expansion
- Rebuilding of I-5 (which divides Chinatown and Japantown from Little Saigon)
- Nearly any upgrade to the City's water, sewer and electric infrastructure (Chinatown-International District and Pioneer Square are situated along Seattle's urban "waistline"—where the land narrows between Lake Washington and Elliot Bay – so the infrastructure runs through our area)
- Development of a new Cruise Ship terminal by the Port of Seattle

Piling one disruptive mega project onto another project magnifies the impact of all of them. Cumulative impacts in south downtown bear serious consequences that must be thoroughly evaluated. The EIS must identify such cumulative projects and identify mitigation that is equal to the cumulative impact.

Land Use

Pioneer Square and Chinatown-International District seek to advance two potentially competing objectives: promote and enhance transit-oriented development and minimize displacement of the kinds of small businesses affordable housing that exist in the neighborhoods today. As a potential major disruptive force in our community, the EIS should discuss how the Project's construction and operational impacts will affect each of these objectives and should identify mitigation of any adverse impacts.

Pioneer Square and the Chinatown-International District have undertaken a number of land use studies and planning exercises to clarify our priorities and guide future community development. Attachment A includes links to all of these studies and plans. Key land use policies that the West Seattle/Ballard Link project will most likely impact, and which need to be addressed in the EIS are:

- The Chinatown-International District has the highest public transit ridership of any Seattle neighborhood. Creating and enhancing a vibrant pedestrian environment, public gathering spaces, and transportation connectivity between Union Station and King Street Station are stated priorities for our communities (see the draft Jackson Hub Concept Design Report, http://allianceforpioneersquare.org/what-we-do/public-realm/parksgatewaysproject/). Any option for the West Seattle/Ballard Link alignment through the

Chinatown-International District must address this priority, incorporate elements of successful transit hub models, and avoid the mistakes of unsuccessful or struggling transit hubs. The EIS should specifically discuss mistakes that have been made with respect to the street environment associated with the Third Avenue bus tunnel and explain how such mistakes will be avoided here.

- Transit-oriented development that provides affordable small-business spaces, affordable housing, and sustains businesses that meet the needs of a lower-income, immigrant community—including opportunities in and around Union Station—are another stated priority for our communities (see draft Jackson Hub plan, supra). At recent public workshops held on July 31, 2018 and March 13, 2019, neighborhood residents and representatives specifically expressed a desire to study options that would revitalize Union Station as a transit station. As such, any option for the West Seattle/Ballard Link alignment should enhance, rather than preclude opportunities for transit-oriented development in Pioneer Square and the Chinatown-International District.

In addition, the land use plans and policies support the following goals and objectives, which the EIS must disclose any positive or negative impact on:

- Support the emergence of a significant residential community in Pioneer Square and Chinatown-International District, particularly for market-rate and affordable workforce housing. (South Downtown Executive Recommendations)
- Encourage employment density near the South Downtown transit hub, where King Street Station and Union Station are located. (South Downtown Executive Recommendations, Jackson Hub Project Concept Report)
- Maximize the benefit of activities related to the presence of the Office of Arts and Culture and the Office of Economic Development on the plaza level of the future King Street Station. (South Jackson Street Connections Final Report)
- Enhance public safety and opportunities for social connections, accessibility, and physical activity with environmental design improvements, including street and sidewalk improvements that are healthful, biophilic, and regenerative. (Seattle Chinatown-International District 2020 Healthy Community Action Plan)
- Pioneer Square and the Chinatown-International District are historic and iconic neighborhoods worthy of preservation. West Seattle/Ballard Link design elements should comply with existing neighborhood plans, policies, and guidelines developed to protect the history and culture of these neighborhoods.
- The Chinatown-International District is home to the largest population of elderly and non-English speaking residents in Seattle. The West Seattle/Ballard Link project should include context-sensitive design elements that address neighborhood demographic characteristics.

The Seattle 2035 Comprehensive Plan establishes the following “quality of life” objectives of particular importance to Pioneer Square and Chinatown-International District, which the EIS should recognize and for which it should identify any adverse impacts and potential mitigation:

- Preserve and enhance important public views within the Chinatown-International District and Pioneer Square neighborhoods.
- Establish more high-quality pedestrian-oriented street environments in the project area.
- Reinforce the vitality and special character of the Pioneer Square and Chinatown-International District's many parts.
- Preserve important historic buildings to provide a tangible link to the past.
- Ensure and enhance light and air at street-level and in public parks.
- Enhance the relationship of Downtown to its spectacular setting of water, hills, and mountains.
- Create new parks and open spaces at strategic locations.
- Adequately mitigate impacts of potential redevelopment on the quality of the physical environment.

The project purpose and need statement includes the following purpose: "Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development and multimodal integration in a manner that is consistent with local land use plans and policies…" We request that Sound Transit work collaboratively with City of Seattle to ensure that the design of station elements and the surrounding public realm will support current and future land use plans and policies that promote neighborhood preservation and development. We also request that Sound Transit include members of the public in those conversations, to ensure that community interests are represented in the agency conversations to shape the look and feel and future use in our neighborhoods.

Social and Environmental Justice

The nature of the vulnerable populations within Pioneer Square and Chinatown-International District are an essential part of the nature of the affected environment. The EIS should provide the analysis of social and environmental justice impact necessary for federal funding review.

The EIS will need to evaluate the impacts of construction and operation of all project alternatives on social resources in Pioneer Square and the Chinatown-International District. These social resources include: community cohesion, access to community services and resources, and access to community gathering places. The EIS will need to evaluate the impacts of project alternatives on special populations in our neighborhoods, including linguistically-isolated households and seniors. The EIS will also need to evaluate the impacts of project alternatives on environmental justice populations, including resources and institutions of particular importance to our neighborhoods' minority, low-income, and homeless community members. Finally, the EIS will need to make a determination of whether project alternatives have a disproportionately high and adverse impact on environmental justice populations.

In light of the existing health-related challenges our community members face, and recognizing that the substantial scope and scale of this project and related construction impacts, HSD requests that Sound Transit conduct a Health Impact Assessment to determine the potential effects of project alternatives on the health of populations

in Pioneer Square and the Chinatown-International District, especially vulnerable populations (low-income, homeless, senior, and minority community members). HSD and our partners encourage Sound Transit to use a broad definition of health to include pollution (air, water, vibration, and noise), physical activity, accidents and collisions, social resources, and economics, and identify opportunities to enhance health benefits while minimizing negative health outcomes.

Finally, the West Seattle/Ballard Link project will affect the economic environment in the Chinatown-International District and Pioneer Square neighborhoods. (Note that we disagree with Sound Transit and the City of Seattle's decision not to include Pioneer Square in its Race and Equity Toolkit evaluation of Level 1 and Level 2 alternatives, given the neighborhood's substantial homeless population.) We urge Sound Transit to apply a racial equity lens to the analysis of the project's likely economic impacts for both neighborhoods. We ask Sound Transit to place particular emphasis on evaluating and mitigating for the potential adverse effects of construction and operation on existing and future small and minority-owned businesses, many of which have provided a way for immigrant families to establish their economic sustainability.

Public Services and Utilities

Access to public services and first responders such as police, fire, medical emergency care, transit, schools, and human services is essential, especially given the number of homeless and elderly people living in these neighborhoods. These include human services located in Pioneer Square and the Chinatown-International District—including (but not limited to) International Community Health Services (ICHS), the Chief Seattle Club, Seattle's Union Gospel Mission Men's Shelter, Downtown Emergency Services Center, Compass Housing Alliance, Chinese Information and Service Center—and those located outside of these neighborhoods that serve residents of these communities, including (but not limited to) Lowell and Bailey Gatzert Elementary Schools, Meany Middle School, and Garfield High School.

Disruption to utility services such as water, sewer, and electricity adversely impacts all residents, but especially low-income and vulnerable populations who many not have alternative places to stay during service disruptions.

The EIS will need to evaluate the impacts of construction and operation of all project alternatives on access to public services and local utilities, identify potential disruptions, and mitigate for these disruptions.

Public Safety and Security

Public safety is a serious concern for our community members. According to a 2017 survey of residents and businesses in the Chinatown-International District, nearly 40 percent of respondents reported feeling the Chinatown-International District is not a safe place to live and/or work. (Seattle Chinatown International District Preservation and Development Authority and Interim Community Development Association, http://idea-space.info/wp-content/uploads/2016/05/CID-Survey-Report-061117-002.pdf).

There has been an enduring commitment by community organizations, business owners, and residents in both neighborhoods to improve public safety. For example, in 2015-16, a Task Force of twenty individuals representing Chinatown-International District resident advocates, businesses, property owners, and community development, service, and cultural organizations plus representatives from the Mayor's Office and Seattle Police Department developed recommendations to help the City of Seattle address public safety and other "entrenched issues that have plagued the neighborhood for several decades." Subsequently, the Task Force reconvened as a Public Safety Council to hold the City and community accountable for implementing recommendations emerging from the Task Force.

Unfortunately, despite our hard work and steadfastness, criminal activity persists in our communities. According to data provided by the Seattle Police Department and the Washington Office of Financial Management, the Chinatown-International District ranks third and Pioneer Square ranks fourth out of 57 neighborhoods in Seattle for highest crime rates. (Seattle Police Department and Washington Office of Financial Management, https://www.seattletimes.com/seattle-news/data/crime-rates-down-in-most-seattle-neighborhoods-but-theres-a-big-divide-between-north-and-south/).

The EIS needs to evaluate how construction and operation of each alternative would impact public safety and security in Pioneer Square and the Chinatown-International District. Substantial disruption from construction associated with the West Seattle/Ballard project could threaten our hard work to improve public safety. Considerations such as lighting and visibility, access for first responders, and minimizing unsecured construction areas are essential to ensuring the Project does not exacerbate our communities existing challenges with public safety and security.

Noise and Vibration

The Chinatown-International District and Pioneer Square neighborhoods include important cultural resources vulnerable to increases in noise and vibration. The Wing Luke Museum, for example, has art, artifacts, and installations that are sensitive to vibrations, and whose building has suffered from structural and other deterioration from transportation and utility projects like the streetcar.

In addition, there are nearly 170 unreinforced masonry buildings in Pioneer Square and the Chinatown-International District, according to the most recent documentation by the Seattle Department of Construction and Inspections (http://www.seattle.gov/Documents/Departments/SDCI/Codes/ChangesToCodes/UnreinforcedMasonry/ConfirmedURMList.pdf). Unreinforced masonry buildings are more vulnerable to damage from construction-related vibration than other buildings.

We request that Sound Transit explicitly include what we have learned about vibration effects during other area projects to date, and study the effects of construction and operational noise and vibration to these resources and other project area buildings.

Geology and Soils

As we have learned with other area projects (downtown bus tunnel, new SR 99 tunnel, ongoing and burdensome utility work throughout the neighborhoods), the West Seattle/Ballard Link project tunnel and station alternatives in the Chinatown-International District and Pioneer Square neighborhoods would have substantial effects on geology and soils resources within the neighborhoods. Tunnel boring options could have significant effects on soil stability in the project area, and could result in damage to historic resources as well as new investments in and around the project area. We request a thorough investigation of impacts on geology and soils resources to better assess the hazards and effects on neighborhood landscape, buildings, and potential future impacts to seismic stability in and around the project area.

Historic and Archeological Resources (related to Section 106)

As described in the Jackson Hub Project Concept report, Seattle's iconic transportation landmarks Union Station (1910) and King Street Station (1906) define a still active transportation hub at the south end of downtown. These stations fall within the Pioneer Square Historic District and Chinatown-International Historic District and will be directly affected by the West Seattle/Ballard project. Construction of the Project may also affect numerous other landmark buildings within the two historic districts, as well as affecting the human scale and economic viability of the districts, which is essential to maintaining their historic character. The EIS must provide a full accounting of the historic and archeologic resources in both historic districts, study the effects of the project on each of these resources and districts, and make a determination about adverse effects to the resources. For adverse effects identified, the EIS must disclose potential mitigation opportunities to offset those effects.

It is a clear goal of both neighborhoods to maintain vibrant, living communities within each district. Given the fragile nature of the cultural threads that serve as the underpinning to the historic resources in the Chinatown-International District, the EIS should seek to disclose mitigation for impacts that do not render preservation efforts that result in a "museum of what was" in the neighborhood. Historic markers are not sufficient mitigation. Mitigation identified for the West Seattle/Ballard Link project should reinforce and provide investments toward the cultural elements within the neighborhood that support the overall historic character and integrity.

The West Seattle/Ballard Link Extension project will require compliance with Section 106 of the National Historic Preservation Act. We request that Historic South Downtown be a consulting party to the Section 106 process.

Parks and Recreational Resources

Community gathering spaces are an important part of the Chinatown-International District and Pioneer Square community fabric. Hing Hay Park is located one block east of the Fifth Avenue alternative alignment, and would be subject to serious disruption during construction of the project. The Donnie Chin International Children's Park is two blocks farther away. The EIS must do a thorough review of the parks, recreational resources, and other public spaces in the Chinatown-International District and Pioneer Square neighborhoods, and study the construction and

operational impacts to these resources. Where impacts are unavoidable, the EIS should disclose possible mitigation opportunities that seek to enhance existing and create new public gathering spaces directly in the neighborhood, and potentially within the project footprint.

Transportation

Transportation and parking impacts are one of the most obvious significant adverse impact of the construction process and must be fully analyzed in the EIS. But the EIS should also address the transportation impacts of the completed design. Will it be harder or easier for people coming from Ballard or West Seattle to get to Pioneer Square or Chinatown-International District if the new tunnel has only a station on Madison Street? How will people with mobility impairments be affected? What will the impact be on bus traffic, transit routes, and stops through the neighborhoods? What will the impact on scarce parking be, and how will those impacts affect local small businesses and their access to customers and deliveries?

We have heard throughout the screening process that any alternative will displace buses from the E3 busway through SODO. We request a thorough analysis of where those buses would be routed during construction and once the project is complete. Pioneer Square is currently experiencing the effects of increased bus traffic through the neighborhood along First Avenue due to Viaduct demolition, and through Waterfront construction, and is experiencing the dramatic effects that bus volumes have on the integrity of the public realm (eroded pedestrian environment), as well as wear and tear and direct damage to underground resources such as areaways. The EIS must analyze the effects of bus diversion through the neighborhoods during construction and operation of the project. It should also disclose the cumulative effects of those diversions before and during the project.

The volume of people moving to and through the neighborhoods will have an indelible effect on the fabric of the communities, offering both a threat and opportunity. The EIS must include a thorough analysis of the expected ridership of the West Seattle/Ballard Link project and the total ridership expected to travel to and through the Historic South Downtown station, including the number of people traveling from the new West Seattle/Ballard link to other modes of transit in the neighborhoods: bus, existing light rail, Sounder, Amtrak, Streetcar, ferries. The EIS should provide models of anticipated transit rider movements through the neighborhoods and be explicit about the assumptions used to build those models. HSD requests that Sound Transit engage the community about the assumptions they will use to build their transportation models and provide opportunity for the public to inform the analysis.

PUBLIC INVOLVEMENT

We appreciate the effort Sound Transit has made to engage key stakeholders and members of the public in pre-scoping and alternatives analysis. One ongoing concern is that some residents and businesses in Pioneer Square and Chinatown-International District have not yet had a meaningful opportunity to engage. Language and other barriers—including discomfort engaging with government because of the current political climate and/or

trauma associated with engaging with government in their countries of origin—create challenges to engaging our community members with traditional public outreach methods. However, these challenges are not insurmountable.

We urge Sound Transit to recognize that overcoming these barriers takes time and resources. It means meeting our community members where they are, instead of expecting them to come to us, or to you. We respectfully request that Sound Transit employ tactics that work for our community members, including:

- Review all printed and online materials to ensure they provide a basic project overview and avoid jargon so that newcomers to the project can understand.
- Continue and expand Sound Transit participation in existing community meetings by asking to send project representatives to the "CID Forum"—a monthly community meeting on neighborhood issues and concerns run by InterimCID, scheduled meetings of the Pioneer Square Resident's Council, and other community meetings.
- Continue and expand participation in community events, such as the Night Market run by the Chinatown-International District Business Improvement Area and the Lunar New year celebration.
- Hold outreach events outside Union Station during rush hour.
- Staff at table at Hing Hay Park and Uwajimaya.
- Ask family association boards to share project information with members. (A family association is an organization formed by people who share a common ancestor or surname. In the Chinatown-International District, there are multiple family associations, including the Luke and Gee How Oak Tin Family Associations.)
- Attend community organization board meetings, particularly in Pioneer Square (the Downtown Emergency Services Center, Chief Seattle Club, Seattle Indian Health Board, Navigation Center, Friends of Little Saigon, etc.)
- Place translated outreach materials inside resident buildings.
- Offer multiple engagement opportunities including more online information for those who can't attend meetings.
- Place material on the trains coming into and out of the International District Station, King Street Station, and on buses and bus stops that pass through the area.

Finally, we request that Sound Transit create opportunities for the Chinatown-International District and Pioneer Square neighborhoods to inform design prior to draft EIS publication. Continuing and expanding outreach efforts during the development of the draft EIS will improve the likelihood of bringing the residents, businesses, and other community members along in the process. We believe this will help the project stay on schedule and deliver value and opportunity for all transit users and community members in 2035 and 2135.

Thank you for the opportunity to provide comments on the scope of the EIS. Historic South Downtown looks forward to continuing to develop a collaborative working relationship with Sound Transit to shape the West Seattle/Ballard Link project.

Sincerely,

Barry Blanton, Blanton Turner
Teresita Batayola, International Community Health Services
Lisa Howard, Alliance for Pioneer Square
Kathleen Barry Johnson, Historic South Downtown
Denise Moriguchi, Uwajimaya
Tomio Moriguchi
Savitha Pathi, SAG member, Trustee, Wing Luke Museum of the Asian Pacific American Experience
Beth Takekawa, Wing Luke Museum of the Asian Pacific American Experience
Maiko Winkler-Chin, SCIDpda
Larry Yok, Trustee, Wing Luke Museum of the Asian Pacific American Experience

Attachment A

The Pioneer Square and Chinatown-International District neighborhoods have engaged in multiple studies and community planning processes to define our priorities. The following are links to these studies and plans.

Neighborhood, municipal, and regional plans:

Pioneer Square Streetscape Concept Plans
Pioneer Square Parks and Gateways Project
Pioneer Square 2020 Neighborhood Plan and Updates
Pioneer Square Active Streets Strategy Report
1998 Pioneer Square Neighborhood Plan

CID Public Safety Task Force Recommendations
2008 Economic Development Study (CID OED)
King Street Station Multimodal Hub Health Impact Assessment (2011)
Jackson Hub Project Concept Report
King Street Station/Union Station Square Concept Plan

Imagine Greater Downtown Big Ideas
Seattle Chinatown-International District 2020 Healthy Community Action Plan
Measuring Neighborhood Air Pollution (nearby study)

South Jackson Street Connections Final Report (2016)
Livable South Downtown Overview (2009)
Livable South Downtown Planning Study Executive Recommendations (2009)
Livable South Downtown Background Report (2006)

2017 Parks and Open Space Plan (Seattle Parks and Recreation)
Seattle 2035 Growth and Equity (Seattle OPCD, 2016)
Stadium District Concept Plan (2012)
Seattle 2035 Comprehensive Plan (2015-2035)

Where appropriate, HSD requests Sound Transit adhere to the following neighborhood-specific design guidelines when developing the alternatives for the WSBLE project:

International Special Review District Design Guidelines (DON)
Pioneer Square Prism Glass Design Manual
Pioneer Square Preservation District Guidelines

HISTORIC SOUTH DOWNTOWN

VIA ELECTRONIC MAIL

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

RE: Comments on the DEIS for West Seattle and Ballard Link Extensions Project

Dear Ms. Swift:

The Board of Directors and staff of the Pioneer Square International District Community Preservation & Development Authority (dba Historic South Downtown, *hereinafter* HSD) are pleased to provide these comments on the Draft Environmental Impact Statement ("DEIS") for the West Seattle and Ballard Link Extensions Project ("the Project"), notice of which was issued on January 28, 2022.

On April 26, 2022, the HSD Board of Directors voted to approve the content of the following letter and appendixes, with a vote of 10 yeas with 2 abstentions.

HSD supports the extension of light rail to West Seattle and Ballard, fulfilling a key part of the Sound Transit 3 program approved by voters in 2016. The WSBLE project will transform the region's light rail system and the Chinatown-International District (CID) and Pioneer Square (PSQ). The project carries the potential to create a more connected, accessible regional transportation hub in South Downtown, improving access for commuters using light rail, the Sounder, Amtrak, Seattle Streetcar, Metro, Greyhound, Community Transit and Pierce County busses, and WSDOT Ferries. HSD supports this vision.

In the following, we outline our concerns over the serious, permanent damage posed to the CID by the 5th Ave. S. (CID-2a and 2a Diagonal) options, and the potential for the development of a vibrant, connected regional transit hub with 4th Ave. S. shallow (CID-1a) alignment. We ask the Sound Transit Board of Directors to center the priorities and needs of the equity-seeking communities of color in South Downtown. Our comment letter consists of this cover letter and three appendices.

HSD AND SOUTH DOWNTOWN HISTORIC DESIGNATIONS

HSD was created by the Washington State Legislature in 2007 to preserve, restore, and promote Seattle's historic PSQ and CID neighborhoods. HSD exists to help the neighborhoods of PSQ and the CID mitigate and recover from the effects of large public projects. We are governed by a board of directors drawn from the community, elected to represent local businesses, residents, government, arts organizations, non-profits, and historic and cultural organizations from both neighborhoods.

Each neighborhoods contains a core area listed in the National Register of Historic Places, and an overlapping, slightly larger area protected by local historic district designations and related preservation regulations. The National Register (NR) boundaries show that Union Station, the existing ID/C light rail station, and the ID/C plaza are within the Pioneer Square NR district. Maps of the local historic districts show that these areas are contained within both the Pioneer Square Preservation District and the International Special Review District. Additionally, Union Station is individually listed in the National Register of Historic Places.

SOUTH DOWNTOWN – DIVERSE, HISTORIC COMMUNITIES

PSQ and CID are home to Indigenous people, non-English speaking households, immigrants and minorities at higher rates than other Seattle neighborhoods, and higher than any other communities along the proposed Ballard or West Seattle alignments. Both neighborhoods support a high percentage of small, locally-owned businesses, which contribute to the vibrancy of the communities and attract visitors from around the world. The core of the Chinatown historic district is strongly connected to the immigrant Chinese, Japanese, and Filipino communities. A late 2020 survey of businesses in the historic district found that more than 67% meet multiple definitions of "small business" and 88% are Black, Indigenous, or People Of Color (BIPOC)-owned.

Both neighborhoods are at an exceptionally vulnerable point in their 100+ year histories. The COVID-19 pandemic, 2020 protests against racial injustice and police violence, and an epidemic of anti-Asian incidents disproportionately impacted our neighborhoods. The crisis of houselessness that affects all of Seattle and the region is particularly acute in our neighborhoods, particularly in PSQ with its disproportionate concentration of service providers.

Both communities have experienced decades of highly disruptive public infrastructure projects. A consistent theme of these projects is that they generate benefits regionally while the burden of negative impacts is felt primarily locally. In recent years, the projects include construction and operation of two stadiums, the SR99 Deep Bore Tunnel, First Hill and Center City Connector Streetcars, Seawall, Seattle Waterfront and demolition of the Alaskan Way Viaduct, and utility upgrades. All of this has taxed our resources and exposed us more than ever to the corrosive effects of displacement and gentrification.

Despite the challenges PSQ and CID communities face, our neighborhoods are resilient. Although the COVID-19 pandemic and racialized violence have stymied small businesses and sent residents indoors for more than two years, currently we are witnessing the glimmers of an enduring community. The restaurants and cafes are seeing customers return. Neighbors are once again gathering in Hing Hay Park to practice tai chi or play a round of ping pong. Work continues to implement the Jackson Hub Concept Plan, a community-led effort to create a

welcoming, safe area at S. Jackson St. between 2nd Ave. S. and 5th Ave. S., where the two neighborhoods meet.

Although the Omicron surge in January delayed the traditional Lunar New Year celebration, community members and people from across the region will gather on April 30 to celebrate together. Long-closed upper floor businesses are returning to PSQ, and Occidental Park is filling its once empty tables with people grabbing lunch or coffee amongst the mature London Plane trees and historic buildings. The interplay between local businesses, residents, visitors, employees, and the celebrations, traditions, festivals, seasonal rhythms and stories has built two unique neighborhoods rich with intangible cultural heritage.

In the early planning of the Project, the City of Seattle and Sound Transit identified the CID as the only neighborhood within a half-mile of the representative alignment with a concentration of communities of color greater than the citywide average, and therefore subject to specific focus and support through the Racial Equity Toolkit (RET). Our neighborhoods—historic, iconic, and home to multigenerational, multilingual, socio-economically diverse Seattleites—deserve this protection and support.

RACIAL EQUITY AND ENVIRONMENTAL JUSTICE

Like communities of color across the country, the CID and PSQ have been harmed by more than a century of public projects and policies that have, at best, failed to center communities of color and low-income residents, and at worse, baked racist policies into the infrastructure of South Downtown.

Sound Transit and the City of Seattle have partnered to use the RET in the planning and construction of the Project. In relation to the CID, the RET states the joint intent of these public entities is to 1) limit harmful impacts of the project and work with impacted communities to identify opportunities to repair past harm; 2) maximize connection for all users; and 3) [ensure] community shapes decisions that impact them, through self-determination and with a 100-year vision for future generations.

The National Environmental Policy Act (NEPA) does not require an effort as detailed as the RET, but it does require an evaluation of whether the Project would result in disproportionately high and adverse effects on minority and low-income populations, and require Sound Transit's engagement with these populations to encourage their active participation in the planning process. The RET is also consistent with Executive Order 12898, and therefore with the purpose of the Environmental Justice analysis.

To ensure the RET/Environmental Justice analysis appropriately acknowledges the cumulative harm caused by more than a century and a half of public policies and infrastructure projects based in systemic racism, HSD has compiled a list of examples, attached here as Appendix A. Please note that as with many instances of systemic racism, some of these events were initiated to have positive and protective impacts but unintended consequences arose that created new barriers or disproportionate problems for the BIPOC community.

Also please note that while the Environmental Justice analysis references these impacts in the narrative, it does not include them in the documentation of the analysis that led to an Environmental Justice conclusion of no disproportionately high and adverse impact (Appendix

G, Table 5-4, pages 5-31 through 5-66). This conclusion is clearly wrong, as is made obvious by the analysis included in this submission. See infra and attached Appendix A.

UNDERSTANDING PAST HARMS AND BROKEN PROMISES

The RET and the Environmental Justice appendix of the DEIS both seek to address past harms and help to involve community in planning to avoid disproportionate impacts on communities of color. We believe it is important to spell out what some of those past harms have been, and to recognize how more modern projects have allowed systemic racism to overcome stated positive goals, to ignore community priorities, and to break promises made to communities of color. For that reason, we have listed examples of racist practices, attacks, incidents, redlining, and even well-intentioned policies that have increased barriers, going back more than a century. *See Appendix A*.

Union Station was built in 1911 and brought the Oregon and Washington Railroad regional rail into south downtown. It served until 1971, when Amtrak consolidated into King Street Station. Early planning in 1973 began to explore using a facility designed to handle thousands of passengers for multimodal transit. It was studied again in 1985, 1989, 1992, and finally 1998 when it became the headquarters for newly-formed Sound Transit. The building is still underutilized, even after almost 50 years of studies. While return of passenger rail access to the building is listed in the DEIS as an adverse impact due to construction disruption and partial property acquisition, we believe that a thoughtfully-designed adaptation could return integrity of use, feeling, and association to this iconic building that stands as an entrance to downtown Seattle and the intersection of two historic districts.

In numerous outreach activities over the course of the WSBLE project, Sound Transit staff have engaged the community in visioning exercises to surface community priorities and goals. *These outreach efforts were required and necessary* in the context of this ambitious transit project. However, for many people in South Downtown, the overwhelming feeling is that *we have been here before.*

In 2019, the City of Seattle, Sound Transit, and King County agreed—at the request of a coalition of South Downtown stakeholders—to partner with us to review past outreach outcomes and consolidate what community members have been saying for the past 20 years about our interests, needs, concerns, and priorities. This review revealed remarkable consistency over the course of decades. The City, Sound Transit, and King County also agreed to incorporate many of these neighborhood self-defined priorities into future projects plans that affect our communities—including this Project. These priorities are:

1. Retain or increase community ownership of properties
2. Improve public safety
3. Enhance community vitality and sustainability
4. Encourage economic development
5. Enhance public health and well-being
6. Acknowledge and address historic racism that has and continues to impact neighborhoods
7. Minimize cumulative harm to and/or displacement of existing businesses, residents, and nonprofits
8. Activate common areas

9. Increase economic diversity in businesses and residents
10. Improve mobility and connectivity
11. Retain historic and cultural character
12. Support a small business environment
13. Ensure that people across Seattle and the region continue to visit the neighborhoods, even during construction

In recent years, Seattle, King County and Sound Transit staff have worked with PSQ and CID stakeholders on implementing the Jackson Hub Concept Plan, published in 2019. This is an example of ways that governmental units are working to center community priorities and accomplishing shared goals. However, there is still no actionable result from the Concept Plan work. The RET is another opportunity for our governmental partners to illustrate support of equity-seeking communities and demonstrate that promises will be kept.

To ensure that Sound Transit and the City of Seattle meet their stated outcomes of: 1) limit[ing] harmful impacts of the project and work with impacted communities to identify opportunities to repair past harm; 2) maximiz[ing] connection for all users; and 3) [ensuring] community shapes decisions that impact them, through self-determination and with a 100-year vision for future generations, the DEIS must center the values and priorities of the people of the CID.

FIFTH AVE. S. IMPACTS

The proposed 5th Ave. S. alignments (CID-2a, CID-2b, and CID-2a Diagonal), would break the promises and stated goals of the RET. The direct, permanent impacts on four to six National Register-eligible/-listed buildings, with additional indirect and construction impacts on another four+ buildings and would constitute a significant adverse effect on two National Register-listed historic districts. With the addition of parks, it also results in a significant increase in use impacts under 4(f) (1 resource versus 3-4 resources).

There is an open question as to whether the long-term, direct, and indirect impacts of the 5th Ave. S. options could be mitigated at all. Is the loss of intangible cultural heritage something that could be addressed monetarily? Would mitigation programs accomplish their goals within a predictable timeline? HSD does not think so. Instead, this Project requires design that avoids the catastrophic impacts of carving up two blocks of the CID.

A 4th Ave. S. alignment *shifts* the impacts and trade-offs for a *regional* transportation system outside of a fragile, historic, ethnic neighborhood that was red-lined into existence. The entities who would be impacted with the siting of the station on 4th Ave. S., in general, have stronger financial infrastructure to bear the burdens. A 4th Ave. S. choice would distribute the impacts equitably across the region, be primarily economic, and suited to the current mitigation guidelines.

Additionally, a station constructed between existing transit options bears the potential to smooth the rider's experience when moving between modes of transit. The 4th Ave. S. alignment would support implementation of significant parts of the Jackson Hub Concept Plan, particularly in regard to connections between neighborhoods and transit. It would increase pedestrian infrastructure and align signals to prioritize pedestrian and transit-rider experiences in this important corridor, which would have lasting benefits to both PSQ and the CID.

DEEP STATION OPTIONS SHOULD NOT MOVE FORWARD

After careful review of the WSBLE DEIS, the HSD Board does not believe that either of the deep tunnel options, CID-1b or CID-2b, meet the stated goals of creating a user-friendly mass transit system and interconnected transit hub around Union Station and King Street Station. They also do not meet the community goals of connectivity between transit and the CID and PSQ neighborhoods.

We do not believe the deep options—with their elevator-only access and longer transfer times—serve to support the neighborhood or the region. Even a bank of eight elevators will be unable to keep up with crowds during major events (e.g., football, soccer, or baseball games, or Lunar New Year), or when there are mechanical problems. Nor will elevator-only access be viable if there is another global pandemic, making it unsafe to ride in an elevator with a non-household member. We fear that elevator-only access will lead people to disembark or transfer at a different station with less onerous transfers, undermining multiple goals for the performance of the new station. The deep options would also make light rail transportation inconvenient for residents of PSQ and the CID. With all these challenges, we believe that CID-1b or CID-2b diminish the project's purpose and need and should therefore be removed from further consideration.

DIRECT, INDIRECT, SHORT- AND LONG-TERM IMPACTS OF 5TH AVE. S. ALTERNATIVES

In 2022, if you were to stand on the plaza of the International District/Chinatown (ID/C) light rail station at S. King St., you would physically be in both the CID and the PSQ historic districts.

Around you, the ID/C station plaza is bordered by the early 20th century brick architecture of Union Station, and steel and glass architecture of early 2000s development. The 1990s ID/C plaza has brick paving and steel trellis superstructures, with art and poetry elements worked into the plaza so subtly that they have been forgotten. The steel and glass architecture of the buildings to the south and west of the station house some of the only chain food businesses within the two historic districts. The glass reflects the historic buildings across 5th Ave. S.

To the east, you see the heart of Chinatown, framed by the Historic Chinatown Gate. It is an active commercial area, but one still recovering from the coronavirus pandemic and the attendant rise in anti-Asian violence.

Storefronts along 5th Ave. S., particularly north of S. King St., have suffered from the lack of commuter and daytime business traffic, but the small storefronts along S. King St. are still active. The corner building houses Joe's Bar, a small local dive that has been a tavern or bar dating back to at least 1938 – five years after the end of prohibition - when it was Mrs. Ko Nishiyama's Beer Parlor. A few storefronts down S. King St., Seattle's Best Tea, a Taiwanese tea and boba shop that has been open since 1996 in a space that used to house a billiards parlor and a Thai market, but that now serves boba devotees. These anchors support traffic to new businesses like Chung Chun Rice Dogs, which opened in one of these smaller, affordable spaces, and which is something of an Instagram sensation

South of the Gate, the Publix is a 21st century success story, rehabilitated from its early single-room occupancy hotel configuration to a market-rate apartment rental, with a new apartment

building on the south, complementing the historically contributing architecture. Both Publix buildings, along with the commercial buildings to the north, have ground floor retail, small local businesses contributing to the vibrant entrepreneurial community of the CID.

Behind the Publix is a parking lot and a low, one-story brown stucco building with a striking blue tile roof - the old Uwajimaya grocery store - now known as the Nagomi Plaza. Behind the Nagomi Plaza is the new Uwajimaya, a multi-story building with apartments rising above the grocery store, food court, and a few other small businesses that activate the street fronts.

Most of this area is either owned or occupied by local, minority families, who have built up businesses, educated children, and passed on a commitment to the CID community.

What will this neighborhood look like in 2042?

Per the DEIS, if either CID-2a or CID-2a diagonal are built, the locally-owned parcels will have been purchased by Sound Transit. A ventilation tower and emergency exit structure will sit in the middle of what had been the Nagomi Plaza parking lot. The rest of the block between the back of the Publix, 6th Ave. S. and S. Weller St. will be vacant. The station entrance will sit across the street, on another almost completely vacant lot, with bike storage and another empty lot at the opposite corner of that block. The community will be working to define what happens next. At that point, how will the potential TOD plan incorporate the communities' long-stated priorities? Once the Historic Chinatown Gate is surrounded by empty lots, how will Sound Transit engage to restore the intangible cultural heritage that was lost along with the buildings and businesses?

Economics and Cultural Practices are Intertwined in Chinatowns

The DEIS acknowledges that the CID has strong social cohesion, as well as high risks for displacement, defining neighborhood cohesion as "the extent to which residents have a sense of belonging to their neighborhood … consider[ing] the interactions between the residents and the resources in the neighborhood" (DEIS 4.3.4.1.1; 4.3.4.3.3).

Chinatowns have always been a combination of economic participation in white culture while being refuge from that dominant culture. The space that mediates this relationship for a group that has been deemed a perpetual "other" is imbued with intangible cultural heritage: traditions, manifestations, and living expressions of living culture, knowledge, and skills, including languages and festivals.

Seattle's CID is unique in bringing together Chinese, Japanese, Filipino, Vietnamese, and Cambodian immigrants together in a space that defined by their "otherness" but which has built that identity into a strength of community identity. Unlike any other neighborhood along the WSBLE corridor, the CID provides a space for belonging through culturally-competent social services, recreational and cultural spaces, and culturally-relevant small businesses.

The CID houses a tradition of immigrant entrepreneurship, often transferred down generations, creating family wealth and stability that was otherwise impossible for Asian immigrants to access. Economic and cultural impact cannot be considered separately from one another in this neighborhood.

CID-1A, 4TH AVE. S. SHALLOW, ALIGNS WITH COMMUNITY PRIORITIES AND AVOIDS HARMFUL IMPACTS TO COMMUNITIES OF COLOR

The 4th Ave. S. shallow option, CID-1a, is the alternative that avoids, rather than attempts to mitigate, unmitigable cultural impacts. And more importantly, the 4th Ave. S. shallow option allows Sound Transit and the City of Seattle to partner in a project that will create a thriving regional transit hub and move forward important and long-delayed priorities of the surrounding communities, including ideas proposed in the Jackson Hub Concept Plan.

The benefits of a 4th Ave. S. shallow option will benefit the community and the region by truly fulfilling a 100-year vision. It will:

1. **Improve mobility and connectivity**: shallow options mean easier and more convenient transfers between light rail lines and easier access to other transportation modes. A 4th Ave. S. alignment provides direct transit connections to both the CID and PSQ neighborhoods, as well as the most direct connections to Sounder, Amtrak, and the stadiums. With the pedestrian underpass, it improves the pedestrian experience for people using light rail or just trying to get across 4th Ave. S.

2. **Activate common areas**: CID-1a would activate Union Station by reviving its original purpose as a train station. By serving as the location for the new light rail station entrance, and a connection between the existing and proposed stations, the revived Union Station would be readied for further successful activation. However, any programming activation must be fully funded.

3. **Improve public safety**: Additional activation of Union Station, the S. Weller St. Pedestrian Bridge, and the 4th Ave. S. and S. Jackson St. intersection with pedestrians will improve public safety. This serves to enhance public health and well-being by increasing pedestrian safety and connectivity between the CID and PSQ neighborhoods. The City's Station Planning Progress Report also identifies pedestrian improvements to be made around the station, which would further increase these benefits.

4. **Minimize cumulative harm to and/or displacement of existing businesses, residents, and nonprofits**: This community priority meets the RET outcome goal, as well, and a 4th Ave. S. alignment will avoid the displacement of 19-27 small businesses in the CID along 5th Ave. S., S King St., 6th Ave. S., and S. Weller St. Additionally, by moving the core construction outside of this fragile ethnic neighborhood, the impacts of the project are shared regionally rather than locally by small, minority-owned, under-capitalized businesses.

   Increasing economic diversity in businesses and residents, **encouraging economic development**, and **retaining/increasing community ownership of properties** are additional goals that are best viewed under cumulative harm, as the economic and cultural life of the CID and PSQ are intertwined. These priorities will require Sound Transit to work with the communities and the City to identify needs, barriers, and opportunities to improve the long-term sustainability and viability of these important historic neighborhoods in Seattle.

HSD aims to support a small business environment and asks Sound Transit and the City to join us in this goal, which will enhance community vitality and sustainability and retain historic and cultural character. In different ways, both PSQ and CID are neighborhoods developed by small, local entrepreneurial businesses, with their mixed-use buildings and housing residents behind and above the businesses that provide employees and patrons.

5. **Ensure that people across Seattle and the region continue to visit the neighborhoods, even during construction**: By avoiding construction impacts on 5th Ave. S., S. King St., and S. Weller St., the CID is protected from massive construction disruption, allowing the businesses, non-profits, and cultural cohesion to continue on their current path, attracting locals and visitors from around the world to visit. Similarly, PSQ would not suffer the same level of construction impacts they have faced in recent projects. The design of the construction mitigation plans will be key in achieving this goal, and communities should be involved.

6. **Acknowledge and address historic racism that has and continues to impact neighborhoods**: Appendix A has a starting list for *acknowledging* past impacts of government actions on these neighborhoods. Addressing them should be incorporated into the FEIS in the cumulative effects section, along with designed mitigation and project mitigation that attempts to leave the communities with increased equity post-Project construction.

ADDITIONAL STUDY IS NEEDED TO ADDRESS 4TH AVE. S. IMPACTS

Every effort to improve our regional transit network will involve trade-offs. As discussed above, HSD does not believe the trade-offs called for in the 5th Ave. S. options provide sufficient benefit or can be effectively mitigated.

This does not mean that the CID-1a 4th Ave. S. alignment is without substantial impacts. There are many outstanding questions that remain unanswered in the DEIS. HSD is requesting that the Sound Transit board commit to a period of additional study and transparency of 4th Ave. S., to answer these many remaining questions and allow for a thorough mitigation plan to be developed. Some specific points to highlight:

- The additional study requested is not intended to delay to the WSBLE timeline. Rather, HSD requests that Sound Transit staff continue to engage with the community as it answers the questions listed below (and others that arise) so that community can be involved in the direction forward, instead of passively receiving the Final EIS next year.
- Chief among the concerns is the projected cost overrun. Sound Transit has engaged in voluntary cost refinements on other segments of the proposed alignment. It must do an aggressive refinement for the 4th Ave. S. Shallow option as well. HSD is asking Sound Transit to right size the 4th Ave. S. alignment and station within the budget and apply design strategies to shrink the cost. Apply the same kind of innovative thinking and creativity and effort used to generate the 5th Ave. S. diagonal alternative (a station proposed by Sound Transit to address the challenges they have identified for CID-2a), to explore improvements and refinements to CID-1a.

- What construction practices or design refinements can Sound Transit and City of Seattle utilize to manage detours, traffic diversions, and minimize road closures?
- Bus routes DO need to be maintained during construction. Can buses and transit be given priority on what remains of 4th Avenue during construction?
- What will the impact be on the S. Weller St. Pedestrian Bridge?
- Can the impact on Ryerson Bus Base be further reduced?
- How can haul routes be reoriented outside of the CID and PSQ neighborhoods, with their small-scale pedestrian environments, areaways, historic buildings, and concentration of human services?
- Sound Transit should address how surge events during construction can be managed. Additionally, the FEIS should address how the new CID station design will accommodate surge events in operations.

ADDITIONAL STUDY NEEDED IF 5TH AVE. S. ALTERNATIVES PROGRESS

If the Sound Transit Board decides to proceed with study of the 5th Ave. S. alignments, additional study and cost estimates for substantive, transformational mitigation must be included. These include:

- A community ownership commitment for any parcels of land designated for equitable transit-oriented development. For example, investigate the feasibility of a community land trust or other non-traditional models and creative approaches to community ownership.
- Additional study of the economic feasibility of TOD within the context of the International Special Review District regulations, considering community capacity and financing. As TOD is intended to increase density around transit hubs, but the CID and PSQ are already high-density neighborhoods, can additional density be achieved within the historic district regulations?
- An understanding of the cultural importance of small business ownership and small unofficial incubator spaces must be developed to facilitate proper mitigation and relocation packages for affected small businesses. In a small business district like the CID, businesses exist within a network of other small businesses. Relocations have ripple effects. Sound Transit needs to assess these effects or provide support for community organizations to study this, prior to settling on a mitigation package.
- Funding to support small local businesses with non-English speaking proprietors to prepare to engage in the Uniform Relocation Act, including bookkeeping and legal support, based on lessons learned engaging with Rainier Valley businesses dealing with mitigation in ST1.
- Funding for community organizations in the CID and PSQ to hire additional staffing and/or contractors and develop programs to assist their constituents and visitors to prepare for construction impacts, navigate the construction period, and advocate for community vision until the promised TOD is complete.
- Any effort to activate Union Station while siting the new station on 5th Ave. S. should include mitigation funding to operate and manage the property as long as and until the operation becomes self-supporting.
- The loss of the cultural fabric is problematic and will require creative efforts to mitigate. It is possible that community-defined metrics could be created to measure ongoing diversity and vitality of life in the CID and PSQ. Attention should be paid to forces that

promote gentrification or displacement, including median rents of residential and commercial real estate, percent of local ownership, and other indicators. Funding would be needed to define an appropriate study, to reassess periodically (every year at first, then perhaps every five years for a total of 20 years after the TOD is complete) and to provide remedies for the long-term, indirect impacts that are identified at Project outset and in the future.

Additionally, given the unique historic neighborhoods present in the CID segment of the Project, we suggest that additional analysis on cumulative effects be presented to demonstrate the impact of the largest public infrastructure project in the city of Seattle's history on the two oldest neighborhoods in the city. The past infrastructure projects in the neighborhood have benefitted a regional transportation network to the detriment of these equity-seeking communities. We applaud Sound Transit's state goal to repair past harms, and support every effort to ensure these promises are fulfilled.

CONCLUSION

Based on review of the current information, we believe that the CID-1a 4th Ave. S. shallow option offers the greatest potential to achieve community priorities, create direct connections between PSQ and CID neighborhoods, and improve transit connections between modes. However, there is a need to clarify cost, traffic and transit impacts, construction phasing and staging, and construction management plans for the 4th Ave. S. option and reengage community prior to the completion of the FEIS. We believe CID-1a comes the closest to delivering both local and regional benefit while protecting the irreplaceable cultural core of the CID neighborhoods.

HSD is grateful for this opportunity to comment on the DEIS, and the efforts of Sound Transit staff to reach out to our diverse communities. We look forward to continuing to work with Sound Transit board and staff to ensure the successful completion of the most ambitious and costly public project undertaken in Seattle's history.

Sincerely,

Kathleen Barry Johnson
Executive Director

Dana Phelan
President, Board of Directors

Attachments:

Appendix A: Listing of past racist or racially impactful policies, projects and incidents
Appendix B: Detailed list of DEIS comments and questions
Appendix C: Matrix of community priorities and impacts of pending options

CC: Sound Transit Board of Directors, Seattle City Council, King County Council, The Honorable Mayor Bruce Harrell and The Honorable County Executive Dow Constantine, The Honorable Representative Sharon Tomiko Santos, The Honorable Representative Kristen Harris-Talley, The Honorable Senator Rebecca Saldaña, The Honorable Senator Maria Cantwell, Senator Patty Murray, The Honorable US Representative Pramila Jayapal, The Honorable US Representative Adam Smith

HISTORIC SOUTH DOWNTOWN
APPENDIX A Harmful Government Actions

Government Policies, Actions, Inactions resulting in inequitable and/or racially-motivated negative impacts

This list was compiled in conversation with community members in South Downtown and is not intended to be a comprehensive list of impacts on these two historic neighborhoods. We have attempted to group these examples by time and type of activity, and to give some context where possible as to the impact of the actions.

We intend this list to provide examples for guidance when the City and Sound Transit state their intent to "identify opportunities to repair past harm." To repair, one must first acknowledge and name the harm. Then one must seek to understand these communities to cease causing inadvertent harm (see “Neglect & Erasure” section below)

Overtly white supremacist measures
After the Civil War, the United States began to formalize its claims on the West Coast. Governments began making laws that preferred the rights of white, European immigrants, stigmatizing the status of being non-white, and setting the stage for 1-1/2 centuries of discrimination and marginalization. Examples of these laws include:

- 1864 Alien Land Laws (state-level)
    - Initially, taking of native property by European settlers, then prohibited or took land ownership from Native Americans and, eventually, immigrants of color, who were also denied citizenship.
- 1865 Exclusion of Native Americans from living within Seattle City limits
- 1882 Chinese Exclusion Act
    - prohibited naturalization and created first immigration exclusion based on race and place of origin. Repeatedly renewed and reinforced for 8 decades.
- 1942 Executive Order 9066
    - In addition to incarcerating Japanese immigrants and Japanese-American *citizens*, this rule also forced many to sell land, businesses, and personal property at a loss. Exceedingly few people were able to reclaim their property after the end of WWII, leading to a drastic reduction in the size of Nihonmachi.

Health and safety regulations with overt white supremacist intent, racist impacts, or unintended and inequitable consequences
Public health measures have a history of being promoted as a strategy for “encouraging” non-white laborers and entrepreneurs to return to their countries of origin. Other cases, like

protective fire codes, were well-intended but imposed a sudden and unanticipated cost of operating residential units. In Chinatown, many building owners simply stopped renting residential space, leading to housing shortages that persist to this day. Examples include:

- 1885 Cubic Air Ordinance
    - Uneven enforcement in Seattle and other west coast cities specifically targeted Chinatowns.
- 1970s Fire codes resulting from the Ozark Fire
    - Measures were necessary fire safety improvements, but implementation created additional burdens on local building owners. Many owners simply stopped renting residential spaces, leaving vacant upper floors and housing shortages that continue to this day. Inequitable access to capital for code improvements exacerbated the issues then and now.
- 2012-present City discussion of unreinforced masonry buildings seismic retrofit upgrade codes, which would place an additional burden on the PSQ and CID neighborhoods with their high proportion of URMs.

Civic improvement, infrastructure, renewal projects

Publicly funded projects, beginning well before WSBLE, have too-often been the excuse to tear down parts of the CID, destroying thriving businesses and residential neighborhoods, and creating a smaller and smaller CID. All were done in the service of "progress," and many inequitably benefitted the larger city or region but with impacts born primarily by these two small historic neighborhoods in south downtown.

By centering on values such as modernization and other white-focused ideas, public projects in the past have labeled parts of the CID as "blighted" or in need of renewal, refusing to value the ethnic livelihoods and culture that had taken root in one of the very few places that were accessible to Asian immigrants. Examples include:

- 1910 Jackson Street Regrade
    - displaced thriving Chinese and Japanese communities
- 1928 2nd Ave. Extension Construction
    - eliminated "Chinatown #2," which had been in Pioneer Square.
- 1941 Yesler Terrace construction
    - While creating innovative integrated public housing, took large tracts of land from Nihonmachi (Japantown) and displaced immigrants who did not have the citizenship necessary to qualify for this public housing
    - Currently being rebuilt – ongoing.
- 1949 Construction of Charles Street Yard by City of Seattle
    - Displaced thriving Chinese neighborhood.
    - Similar impacts were continued/expanded during the conversion to a maintenance facility (1963) and the addition of the Seattle Streetcar spur line (2012).
- 1970s Kingdome Construction, Operation and Demolition, Replacement by new Stadiums
    - Kingdome community impacts were intended to be mitigated by the 21 Stadium Impact Resolutions passed by the City, but **funding ran out in three years**.
    - Baseball Stadium (1997).
    - Seahawks Stadium & Exhibition Center (2000-2002).

    - Operation of stadiums causes traffic congestion, transit congestion, sidewalk congestion, public drunkenness, littering, and sometimes violence, with inadequate public support to mitigate the public safety hazards. The Stadiums' governing organizations participate in a community benefits process, which is helpful, but which requires ongoing staffing and funding, even to this day.
- Transportation projects cause major construction impacts and ongoing increased pollution, degraded pedestrian services, increased traffic and "surge" events. These projects definitely delivered higher levels of service to the neighborhoods of PSQ and CID, however they are also prime examples of projects that deliver the vast majority of benefits to regional or even national interests but leave the burden squarely in the impacted neighborhoods. In the past, the design of many of these projects has created new public safety concerns.
    - 1960s Interstate 5/Seattle Freeway construction
        - Demolished about half of Yesler Terrace (20 years after it was built) removing low-income housing from the neighborhood.
        - Permanently, physically divided the CID.
        - Created a dark, damp "no-man's land" beneath the highway (at least a block wide) where homelessness and drug dealing thrive.
        - Effort to turn areas around the highway structure into greenbelts created hidden (and not hidden) camping areas, led to the development of the notorious "Jungle" encampment.
        - Removed mixed housing and industrial properties throughout the 9th Ave. S. corridor.
    - 1987-1990 Construction of Downtown Seattle Transit Tunnel (now ID/C station)
        - the PSQ headhouse continues to be a public safety concern, based largely on its design.
    - 1990s construction of Interstate 90
        - More dark "no-man's lands."
    - 2009-2019 SR 99 Tunnel construction and Viaduct demolition (2019)
    - 2012-2016 Streetcar construction, utility relocation work
        - Jackson Street, 1st Ave. S., and the 8th Ave. S. spur line – which was related to Charles St. potential redevelopment, yet to happen.
        - 2017 1st Ave. S. utility relocation in preparation of City Center Connector. Both CID and PSQ neighborhoods were promised that major City Center Connector construction-related disruptions would pay off when the entire streetcar system was connected. As of the date of this letter, the City Center Connector streetcar is stalled, and is likely never going to be built.
- Ongoing Waterfront Reconstruction
    - While the eventual public amenity created by a vibrant waterfront will benefit the neighborhoods as well as the city and region, the construction impacts and detours have been onerous for small businesses and neighborhood residents. It should be noted that while PSQ is part of a taxation Local Improvement District (LID), the existing plans for redevelopment stop at Coleman Dock and start again at Railroad Ave., skipping most of the PSQ waterfront. Planning for Pier 48 seems to be constantly out of reach, as other interests and their needs are prioritized above the neighborhood's.

Zoning and land use decisions

As with public health measures, zoning and land use decisions have often provided cover for covertly white supremacist measures (e.g. redlining), but at other times have been instituted for

all the right reasons, with insufficient thought given to unintended consequences. Examples include:

- Repeated rezoning leading to instability in Little Saigon area and the neighborhood surrounding the core historic CID
    - 2012 Livable South Downtown rezoning of Little Saigon area, followed by 2017 Housing and Livability Agenda rezoning around the entire CID
        - Increased building heights in and around Little Saigon twice in a decade caused sale of properties at escalating values that priced out local organizations and long-term property owners.
    - Raised concerns for owners of industrial and warehouse properties about how long they could continue to do business with increased pressures on their properties.
    - Necessary housing is being built without the cultural connection and community ownership that will maintain the vitality and identity of Little Saigon.
    - Overall, community organizations in both PSQ and CID support additional housing affordability, but inequitably bear the burden of this increase when compared to many primarily residential neighborhoods in Seattle, with the unintended consequence of creating a concentration of low-income housing.
- Concentration of human services – city and county policies during 1960s-'70s public policy shifts, consolidated major human services, courts, public safety activities in PSQ.
- 2018 Expansion of International Special Review District
    - Expansion extended the district east from 10th Ave. S. to Rainier without sufficient outreach to local businesses and property owners, resulting in feelings of erasure, confusion, and concern within the community.

Neglect & Erasure

Many of the above examples could also be classified as attempts at erasure. As a red-lined, marginalized community, the CID and PSQ are rarely afforded the attention regularly offered to less diverse areas with fewer minorities and immigrants. Constantly needing to assert one's right to inhabit parts of the city causes generational trauma, suspicion of government intent and disenfranchisement from civic process. Examples include:

- Lack of basic maintenance – areaways, alleys, utilities, curbs and streetscapes, landscapes have not been consistently maintained by the City.
- The accidental elimination of Manilatown. In 2017, Seattle sought to define the CID by ordinance, and neglected to include the history and extant vibrancy of the Filipino community. While Manilatown was added to the bill in a subsequent measure, the need for a people to combat erasure has left an emotional toll.
- No street under Canton Alley for 100 years – paid for by community.
- Lack of culturally responsive public safety and related services – the International District Emergency Center began in late 1970s to fulfill this need.
- Failure to include PSQ in many of the measures and evaluations in the WSBLE DEIS. Even though Union Station, Union Station Plaza, and the existing ID/C station are under the jurisdiction of the Pioneer Square Preservation Board, and most of PSQ is within a 10-minute walkshed, documents and presentations rarely include PSQ by name. As a result, PSQ stakeholders find themselves – in 2022 – needing to assert their existence and ask for consideration to avoid harm.

APPENDIX B: DETAILED LIST OF HSD'S DEIS COMMENTS AND QUESTIONS

Document/Section	Page or Section	Question or Comment	Question or Comment
Acquisitions, displacements, and relocations	4.3.14	C	Consideration of the impact of business displacements should be given with special attention to businesses owned by people of color, immigrants and non-English speakers. Experience in the Rainier Valley during ST 1 has showed that these types of small businesses are vulnerable to under-estimates of the business value, cost of relocation, and reimbursement for lost business. This may be due to informal accounting practices or other factors. Sound Transit's determination of Relocation Assistance or Mitigation should include a rigorous and low-barrier valuation process, with a focus on working with minority and non-English speaking business owners.
Alternatives Considered	2-88	Q	DEIS states cut-and-cover methods will be used to build CID-1a and 2a alternatives. Why does the extent of rebuilding the 4th Ave. S. bridges extend all the way to Main Street? Why not engage in mining the tunnel closer to S. Jackson St.? What is driving the bridge rebuilding north of Jackson?
Alternatives Considered	2-88	Q	DEIS states that deeper stations will be mined. What is driving the surface bridge and roadway impacts for CID-1b (4th Ave. S. deep) if the station for that segment would be mined? Why will there be more substantial impacts to 4th Ave. S. bridges if that station will be mined?
Alternatives Considered	2-91	Q, C	DEIS discloses approximate amount of area necessary for construction staging areas and easements, but the document does not indicate any construction footprint outline. Where is Sound Transit assuming construction staging COULD occur for the project within the CID segment? The property impact maps provided in Appendix L.4 do not indicate what the properties are used for, or the extent of the use (full or partial acquisitions). Where are the property impacts or assumptions for construction staging?
Alternatives Considered		Q	What is the capital cost of CID-2a diagonal? Are there cost savings realized for not having to disturb all the utilities of CID-2a? What about all those properties?
Appendix L4.1 Acquisitions	Maps and tables	Q	What is the assumed disposition of the parcels along 4th Ave. S. that would be completely disturbed for CID-1a and 1b and the site of a proposed tunnel ventilation building?
Appendix L4.1 Acquisitions	Maps and tables	Q	Would CID-2a, diagonal, or 2b result in the demolition of the Nagomi Plaza (old Uwajimaya) building? ST # BD 5021
Appendix L4.1 Acquisitions	Maps and tables	Q	Would CID-2a, diagonal, or 2b result in the demolition Seattle First National Bank building itself? ST # BD 5027
Appendix N.1	6-1, 6-25 - 6-36	C	Evaluation of transit integration at the ID/C station should be part of the decision to site the station either on 4th or 5th. Evaluation of transit integration needs to include all Link lines, all bus lines, Sounder, Amtrak and WS Ferris. The Jackson Hub Concept Report and integrating work done since 2000 should continue to be referenced and consulted during station area planning.
Appendix N.2 Visual Quality Technical Report		Q	Why wasn't Hing Hay Park and Union Station evaluated for operational impacts of having a tunnel ventilation system in the viewshed?
Appendix N.5 Historic and Archeaological Resources Technical report		Q	Why wasn't the Nagomi Plaza building (eligible for listing on NHRP) evaluated under Section 106? ST # BD 5021

CE	7	Q, C	Without more detail regarding the statement that "the project would remove some of the residential and commercial land uses that created demand for this parking," it is unclear what this means for CID, which would experience a permanent loss of parking. What are the land use changes in CID that would correspondingly reduce parking demand? Or is this based on looking at parking loss vs. land use change for the entire project corridor? If its the latter, we have serious concerns, as this type of analysis is neither accurate nor relevant to EJ impacts.
CE	7	C	The conclusion that the changes to the transit system would reduce the need for parking in the study area is inappropriate without a parking study. In the C-ID, for example, anecdotal evidence suggests that short-term parking (on-street, <2 hour) is used by people making trips to the C-ID to shop, visit residents, dine in a restaurant, drive a senior resident to/from appointments, etc. Transit may not be an appropriate or reasonable alternative mode for many of these trips.
CE	8	Q	What are the construction projects that would take place in the CID and PSQ during the ST construction period? Would SDOT continue to issue street use permits for private construction that severely limit already constrained travel and parking for these neighborhoods?
CE	9	C	In response to point that relocations may not necessarily be in the same neighborhood, it must be noted that place is critical to CID; if people are relocated from CID, this could materially impact community cohesion. (on the other hand, we should examine the ICON building resident makeup and determine the extent to which this building contributes to community cohesion)
CE	10	Q	Per earlier comment, relocating in project vicinity is less important in CID than relocating within CID. What is the retail and office vacancy rate in the CID?
CE	10	C	Given history and the lack of policies to control/manage gentrification/cost increases in Seattle neighborhoods, it is likely that WSBLE would contribute a cumulative impact to already fragile businesses in CID and PSQ.
CE	11	C	In the CID and PSQ, it is as much about year after year of construction impacts--plus racialized violence and pandemic that disproportionately impacted BIPOC, seniors and unhoused people--as it is about simultaneous construction projects. This should also be addressed in Cumulative Effects.
CE	11	C	In response to the conclusion that neighborhoods becoming more expensive is an indicator of economic growth (and the implication that this is a benefit), this may be true from a macro standpoint, but from an EJ standpoint, economic growth that primarily benefits the most affluent does not offset disproportionate impacts to the least affluent.
CE	12	C	In response to this conclusion--"as neighborhoods revitalize, amenities and community resources also often improve, which can increase the quality of life for both new and remaining members of the community,"--from an EJ and community standpoint, these assumptions are highly problematic. A community value that was heard over and over again in the 20 years of plans and studies in the CID and PSQ was the importance of retaining community ownership and not displacing people descended from families who have lived in these neighborhoods for generations, and not displacing businesses that have existed for generations. From an EJ standpoint, this whole paragraph represents a high and adverse disproportionate impact, not a benefit.
CE	13	C	The conclusion that changes as a result of the project would cumulatively benefit neighborhood is only an EJ benefit if the local businesses and residents can hang on during construction and don't find themselves priced out after (or evicted for redevelopment).
CE	13	Q	Regarding relocations, need to understand if the proposal is to relocate within the "project vicinity," i.e. the whole corridor, or the neighborhood where these originated? Froom an EJ standpoint, these need to be relocated to the same neighborhood to continue meeting the need.
CE	14	Q	Need more detail on how ST's Equitable TOD and the City's Mandatory Affordable Housing requirements would play out in CID and PSQ. Is this a commitment, or just hopes and wishes? What--if any--proof of concept to City of Seattle and ST have with these complementary programs? How will historic district regulations impact this program?
CE	24	C	RE: "most cumulative impacts would occur during project construction," we disagree with this statement. The cumulative effects of gentrification and displacement are related as much to operations as construction and has been grossly understated in this document.

CE	Global	Q	What is the status of the viaduct structures on 2nd Ave. Ext. S. and S. Jackson St.? Sound Transit needs to include the potential foreseeable need to renovate these neighboring structures in their Cumulative Impacts analysis, including an assessmment of the impact on rebuilding these bridges on the 4th Ave. S. struture and any potential need to tie back those bridges to 4th. Information from SDOT's bridge inventories should support this study.
Economics	4.3.3-14	Q	Economics analysis indicates that Uwajimaya loading dock, entry plaza, and parking garage would be affected temporarily by construction activities, but the transportation analysis doesn't disclose impacts along 5th or 6th Avenues extending south of S. Weller Street. What construction activities would occur that would disrupt the loading dock and parking garage?
Economics	4.3.3-14	Q	Is the DEIS analysis treating private parking lots (surface and sub-surface) as business displacments, or only accounting for them in the "loss of parking" analysis in the transportation section? Is the economics analysis treating the Union Station parking garage, 6th and King surface lot, and Bank of America lot as businesses? Considering it an impact? Temporary displacement?
EJ	97	C	No mention of PSQ in the economics section. Surely there are economic impacts on PSQ as a result of cumulative construction impacts, parking removal, traffic diversion, etc.
EJ	Global	C	No mention of public safety anywhere in this document. This seems like an oversight; public safety (defined in multiple ways, including safety from racialized violence, bike/ped safety) is of high importance to the CID and PSQ
EJ	102	C	Even temporary displacement of some residents could impact community cohesion. While this is a fragile neighborhood, community cohesion is strong and potentially a key factor in the neighborhood's survival. This section does not adequately address the impacts of relocations/displacements on community cohesion. That said, we are not yet convinced that displacement of ICON is going to be impactful on community cohesion, given the makeup of building residents
EJ	102	Q	Has ST met with resident from Eagle Village to understand how this relocation would impact them?
EJ	102	Q	Why PSQ is not included in this discussion. What are the potential impacts of traffic diversions, 4th ave closure, streetcar disruption to community cohesion for PSQ?
EJ	102	C	The social section should mention the risks of gentrification (see Central District as example) and how that would impact community cohesion.
EJ	106	C	RE: "No additional impacts" (Visual Effects). This is incorrect. There would be a large tunnel vent facility placed directly in front of Union Station under Options 1a and 1b.
EJ	109	C	RE: "No airborne noise impacts." This is not correct. According to the Noise and Vibration Technical Report, ST did not test for noise impacts in the CID because it considers it to be a "commercial district," even though it acknowledges there are residential properties nearby (e.g., Publix, Uwajimaya, Downtowner, Hirabayashi Place). We disagree with the conclusion that because City of Seattle treats residential use properties within commercial districts the same as commercial properties, Sound Transit is not obligated to test and mitigate for noise impacts to these residences. See page 127 of the Noise and Vibration Technical Report for reference.
EJ	114	C	PSQ and CID are unique along the corridor in that they host a number of public services for cultural communities and unhoused individuals. Those should be mentioned here and the potential impacts on them detailed
EJ	116	C	The conclusion that impacts to historic resources will affect minority people the same as everyone else is wrong. The CID is the only neighborhood along the alignment with impacts to historic properties (according to this table), and these properties are of particular importance to minority communities.
EJ	118	C	Construction impacts and visual impacts to the viewshed to Hing Hay Park should also be mentioned in Social section (impacts to community cohesion).
EJ	Table 5-4	C	No indirect or cumulative effects row? Why not? This is a major impact on EJ--even the RET says this.

EJ	Table 5-4	C	The economic analysis does not address the loss of cultural context for the businesses that will be relocated under CID-2, or appropriateness of replacement buildings, particularly in terms of the community priorities of local ownership, loss of affordable storefront spaces such as the existing ones that serve as an incubator for small, locally owned businesses. New ideas need old spaces because they are affordable. The "mom and pop" business needs affordable spaces too. The economic analysis of the impact on the CID, for all the CID-2 options (5th Ave S) must include the long-term impact on the type of businesses that are currently located in the CID.
EJ	Table 5-4 pg 5-40	C	The land use analysis assumes that the replacement of current buildings with new TOD buildings will be a benefit to the neighborhood and the BIPOC populations living there. This is not a reasonable conclusion when the buildings to be replaced are already owned and occupied by many minorities. Local ownership is a key priority for the community and is seen as a way to ensure the cohesiveness of the area. The land use analysis should not tout replacing minority and locally owned parcels with other developments that are unlikely to return to commmunity and minority ownership.
EJ	125	Q	Mis-characterization of “offsetting benefits” in Environmental Justice analysis: The U.S. Environmental Protection Agency and Federal Transit Administration permit agencies to consider “offsetting benefits” when drawing a conclusion about whether a project has a disproportionately high and adverse impact on environmental justice populations. To count as an offsetting benefit, however, the positive effect needs to disproportionately benefit the affected populations. According to the Environmental Justice analysis, Sound Transit considers better access to transit and job centers to be an offsetting benefit for the residents of the Chinatown-International District. We disagree.
EJ	130	C	The new light rail station in the Chinatown-International District will enhance a regional transit hub, connecting people from all four corners of the region with buses, commuter rail, and Amtrak. While residents of the Chinatown-International District will partake of this benefit along with everyone else in the region, they will not gain substantially more benefit than anyone else in the region. On the other hand, they will bear the brunt of the impacts of constructing and operating this facility. Consequently, we do not believe it is appropriate to consider access to transit and job centers to be an offsetting benefit.
EJ	7-2	C	If, as the DEIS says "Sound Transit is partnering … to evaluate strategies to maintain and enhance community cohesion" why are we not reading about existing strategies that may be considered in this? Why are we not reading about the ways in which ST and the city work together on planning in this? The lack of even rudimentary process discussions in these sections do not give community confidence in the future work of these processes.
General Analysis	Global	C	***Inconsistency in use of high-cost and low-cost project assumptions:*** The technical analyses in the DEIS do not use the same high-cost and low-cost project assumptions. For example, the Economics analysis of the DEIS (pages 4.3.3-1 through 4.3.3-13) indicates that Sound Transit used CID-2a for both the high and low-cost project value to estimate the number of job years (employment) and direct expenditures resulting from the Project. Elsewhere in the economics analysis, CID-1a is listed as the high-cost project alternative in the CID segment. This results in an apples to oranges comparison of benefits generated from employment and local revenue. Similarly, in the Air Quality analysis of the DEIS, "CID-1a" is used as the alternative evaluated for Air Quality standards (page 4.3.6-3), but on page 4.3.6-7, the "low-cost scenario includes CID-2a..." and the "high-cost scenario includes CID-1a.". These differences result in markedly different Greenhouse Gas emissions, again resulting in an apples to oranges comparison. Sound Transit should update its analyses in the Final EIS to address these inconsistencies.
General Analysis	Global	C	***Need for more clarity on construction footprint:*** The DEIS discloses approximate amount of area necessary for construction staging areas and easements, but does not show a construction footprint outline. The property impact maps provided in Appendix L.4 do not indicate how the properties would be used or the extent of the use (i.e., full or partial acquisitions). Without more clarity on where construction staging would occur or the assumptions of property impacts for construction staging, we cannot adequately assess or compare the impacts of construction to the Chinatown-International District.

General Analysis	Global	C	The CID-2a diagonal station configuration appears to have markedly different impacts than the CID-2a configuration, and the track path varies between the two options. There are no graphics at a reasonable scale in the draft EIS that illustrate the distinctions between the two options. More explicit treatment of 2a-diagonal as a separate condition should occur so that people can clearly see what amounts to real differences between roadway impacts, property impacts, business impacts, and so on. It is not included in all appendices.
General analysis	Global	C	The over 70 sporting events, concerts, and other events at the stadium complexes was not considered in the DEIS, despite community requests in the scoping phase of the Project. Additionally, PSQ and the CID have festivals and other events that bring thousands to the neighborhoods. These "surge" events and the traffic they create (both vehicular and transit), must be included and evaluated for their effect on the systems both during construction and long-term.
Historical/Archaeological	4.3.16	C	Area of potential effect needs to be expanded to include potential haul routes for preferred alternative in terms of mapping areaways, as the maps will help determine where haul routes can be placed without additional street reinforcement, an additional cost to the project if necessary.
Noise	127	C	"Commercial and industrial districts are in the Chinatown-International District Segment... Although there are no nearby residential districts near the segment there are mixed use properties with residences in commercial districts, such as Uwajimaya and the Publix Hotel. Residential use properties within commercial districts are treated the same as commercial properties within the city of Seattle." While this may be an acceptable policy by noise analysis standards, it should be unacceptable from a RET standpoint. ST should be expected to conduct a noise analysis of impacts to residential properties and commit to mitigation for those impacts.
Noise	4.3.7-11	Q	For Table 4.3.7-3, what is the distribution of impacts by property? The figure only shows two areas (along 5th near Weller and Washington)-- what is the distribution of impacts, and by option? 2a vs. 2a-diagonal?
Noise (N.3)	Global	Q,C	No operational noise analysis was conducted for the CID segment, and therefore for the CID neighborhood, because tunneled options were not considered in the analysis. However, tunnel ventilation systems are identified within the neighborhood, and will be a new source of noise and visual blight. What are the potential noise impacts to surrounding residents and park users from operating a tunnel system at the proposed location?
Noise (N.3)	6-37	Q	For construction noise impact analysis, ST and analysts assumed CID neighborhood is a commercial/industrial neighborhood, and treated "residential use properties the same as commercial properties" per City of Seattle codes. Does this mean that residents were not considered explicitly in the analysis in the same way they would be if their home was located in a residential neighborhood? Please explain.
Noise Figure 4.3.7-2	4.3.7-7	C	Visuals do not show the diagonal station configuration nor track alignment, which differs from CID-2a through the CID neighbhorhood. Difficult to discern or understand impacts without understanding the layout and analysis.
RET	10	Q	What is ST and the City's legal obligations to fulfill the commitments outlined in the RET? What mechanisms do communities have to hold them accountable?
RET	Global	Q	It is unclear whether reference to the C-ID throughout this document includes PSQ or not. Please clarify.
RET	11	C	Change: Limit harmful impacts of project and work with impacted communities to identify [AND IMPLEMENT] opportunities to repair past harm.
RET	16	C	The RET commits to an outcome of limiting harmful impacts of project and work with impacted communities to identify opportunities to repair past harm, and yet the Cumulative Effects report barely acknowledges this and it does not appear cumulative effects are even considered as part of the EJ conclusion. Not mentioned in land use, economics, or transportation sub-sections. Some acknowledgment in the Social sub-section. Included in narrative of EJ section, but not included in documentation of analysis that led to an EJ conclusion of no disproportionate high and adverse impact.
RET	39	Q	Has ST met with Chief Seattle and/or Eagle Village residents to discuss the impacts of this potential reloction? If so, what were the outcomes of those conversations? (i.e., if Eagle Village was already planning to relocate independent of this project, this is not really a project impact. On the other hand, if the project is causing them to relocate, that is an entirely different issue. Same questions apply to the newly-leased spaces along Seattle Boulevard where the Salvation Army will be expanding services for houseless community members.

RET	42	Q	Has ST gathered community feedback--particularly from commercial/retail businesses in the C-ID--about the impacts of parking losses, including differences in impacts of on-street vs. off-street parking losses? What was this feedback?
Social Resources, etc	4.3.4.3.3	C	"ST is currently partnering with the community and other agencies on a community-based planning effort for the area to evaluate strategies to maintain and enhance community cohesion" through station design. If station planning is to be considered mitigation for loss of community cohesion, additional information on structuring this "community-based planning effort" will be needed to allow communities to comment on the benefits of the process.
Transportation	Table N1.E-25	Q	If the 4th Avenue deep station is as deep as claimed, and statements in the DEIS indicated that mined stations would have less ground disturbance-- why is the extent of disturbance at the surface so long for 4th Ave deep (CID-1b), especially at 2nd Ave Extension? Why would that segment of roadway be closed for 6.5 years? There do not appear to be any bridges along 4th Avenue north of Main Street-- what is contributing to the extent of roadway disruption north of S. Jackson Street?
Transportation	Table4-53	Q	Key roadway impact #7 for CID-2b, Is the full extent of S. Jackson St. (2nd Ave. Ext. to 5th Ave. S.) partially closed, or just the intersection?
Transportation and Transit		Q	How will alternatives CID-1a and CID-1b affect the 4th Ave. S. bus island just north of S. Jackson St.?
Transportation and Transit		Q	According to the impacted parcel maps and alternative construction descriptions, CID-2a, 2a diagonal impact parcels north of the Goodwill outlet that appear to be part of the KC Metro Central Base. According to the plan sheets, the tunnel portal and ventilation system are located on King County parcels. Construction roadway impacts listed suggest that 6th Ave S adjacent to the Central Base would sustain partial closures for 6-9 months. Based on the information presented in the DEIS, it is unclear what project activity affects each parcel. What are the explicit potential impacts to KC facilities? Is the Goodwill outlet facility impacted for all 5th Avenue Options and Alternative?
Transportation Technical Report	Table 4-53	Q	Why is the Ryerson Bus Based considered permanently closed for this alternative? The tunnel portal appears to be located further south near S. Massachusetts, and the mining appears to begin at the portal-- what is occcuring at the surface or on the property that renders the base closed?
Transportation Technical Report	general	Q/C	The analysis did not include stadium events in the traffic or ridership analysis, despite data and statements in the draft indicating that stadium events for three sports teams occur more than 1/3 of the year, and acknowledging that concerts and other large events occur between sports events. Historic South Downtown stakeholders requested Sound Transit explicitly include stadium events in the analysis as a baseline condition. Please explain why this was not considered.
Transportation/ Transit	4.3.17.4.3	C	Construction impacts to the Donnie Chin International Children's Park (7th Ave. S.) and/or the ID/C Community Center and Library (8th Ave. S.) need to be considered if construction diverts bus traffic to either street. 8th Ave. S. may have construction projects during the Project construction timeline, which should be considered, as well as the impacts to senior and family housing, ICHS clinic, and the Denise Louie daycare.
Transportation: Freight Mobility	N.1 9-3	Q	The Transportation Technical Report states that CID-2a would impact truck streets along 6th Ave. S. north and south of Royal Brougham way. Plan sheets and other information in the draft EIS suggest that construction of CID-2a diagonal in this vicinity is approximately the same as CID-2a, and could yield the same effects. Statements made in the transportation technical report state that the diagonal station configuration would not impact truck streets. Is this accurate, and if so, why is CID-2a diagonal different in the vicinity of Royal Brougham, than CID-2a?

APPENDIX C: MATRIX OF SOUTH DOWNTOWN COMMUNITY PRIORITIES AND IMPACTS OF PENDING OPTIONS

Community Priorities	CID 1a (4th Ave. S. shallow)	CID 2a (5th Ave. S., shallow)	CID 2a Diagonal (5th Ave. S., shallow, diagonal configuration)	**Environmental Justice and Racial Equity context for Decision-Making**
Minimize cumulative harm to and/or displacement of existing businesses, residents, and nonprofits	Longest construction durations of all the options, but it would move the worst of the construction impacts away from most businesses and residential structures. Will disrupt bus service, which could negatively impact businesesses, residents and visitors. Construction disruptions would be constant for the years of station and tunnel construction for residents at the Icon Apartments. All units of this complex (up to 120 market rate residential units) would be displaced for a year during 4th Ave. S. bridge rebuilding activity. Building is a mix of long-term rentals and hotel/Air BnB short-term housing. Building will remain standing, so housing will be available after construction. Fewest direct disruptions and relocations to local businesses in CID or Pioneer Square. No loss of on-street parking or loading zones within the CID or Pioneer Square during construction	Biggest loss of local retail/commercial businesses in the CID neighborhood (compared to 1a and 1b). Loss of commercial load zones and on-street parking during station and cut-and-cover tunnel construction (up to 9 years). Would displace Chief Seattle-Eagle Village Pilot (if it hasn't already relocated). Need to clarify how Chief Seattle/Eagle Village residents feel about this (e.g., if they are already planning to relocate independent of the WSBLE project, this isn't much of an impact). Construction disruptions would be constant for the years of station construction for residents at Uwajimaya Village, Fujisada Condominium, Publix Building, and Bush Hotel.	Shortest construction durations of all the options. Same loss of local retail/commercial businesses as 2a, but with additional "temporary" displacements of approximately 9 months. Loss of commercial load zones and on-street parking during station and cut-and-cover tunnel construction (up to 6 years). Would displace Chief Seattle-Eagle Village Pilot (if it hasn't already relocated). Need to clarify how Chief Seattle/Eagle Village residents feel about this (e.g., if they are already planning to relocate independent of the WSBLE project, this isn't much of an impact). Construction disruptions would be constant for the years of station construction for residents at Uwajimaya Village, Fujisada Condominium, Publix Building, and Bush Hotel.	Decisions regarding construction that disrupts the heart of the CID should be made only after familiarizing yourself with past harms and priorities set by the community. This project comes in the wake of numerous other projects, events, and policies that have centered the needs of regional interests rather than the needs of the equity-seeking communities who live and work in the PSQ and CID neighborhoods. While 4th Ave does require collaborative work to reduce negative impacts on buses and other constituencies, it centers the priorities of the people of the CID and PSQ, and shares burdens regionally.
Retain or increase community ownership of properties	Unknown until Sound Transit provides more information about the disposition of the 2.5 acres of urban center property displaced by this part of the project. No displacement of small business serving the local neighborhoods.	Permanent displacement of up to 13 businesses and temporary displacement of up to 8 businesses in 4 buildings. One of those buildings contributes to the local National Register district, and two others would be individually eligible for listing based on preliminary assessments during 106 review.	Permanent displacement of up to 13 businesses and temporary displacement of up to 8 businesses in 4 buildings. One of those buildings to the local National Register district, and two others would be individually eligible for listing based on preliminary assessments during 106 review. Additional impacts to businesses in the American Hotel and the Buty building.	The EIS must surface specific plans to retain or increase community ownership of parcel aquired by Sound Transit after construction is completed. Funding support for local organizations must support staffing for appropriate engagement with the planning processes. Mitigation should continue until the completion of any TOD projects.
Improve public safety	Assuming construction impacts adversely affect public safety, construction duration may be the longest of the five alternatives, but may have less direct impact on C-ID.	Assuming that construction impacts adversely affect public safety, shorter than 1a and 1b but longer than deep alternatives. Because of proximity to heart of C-ID, however, it will have more direct impact (noise, dust, visual impacts, etc.)	Shortest construction duration; however most construction would occur in the heart of CID. Noise, dust, and visual impacts could result in avoidance. Pedestrian detours will need to be provided between CID and existing light rail station; station construction could act like a "barrier" between existing light rail station and CID.	Based on prior work in the CID, lighting and accessible sidewalks are important aspects of community public safety and equitable access to transit. Consideration should be given to the large population of elders living in the CID.
Enhance community vitality and sustainability	Offers the most opportunities for promoting connectivity, mobility, and neighborhood connections in the "Jackson Hub" area of high transit access. Opportunities for activating Union Station first as a passenger terminal and then building on that may also offer additional activation of the surrounding plazas, as well as promotion of cultural and economic vitality of surrounding neighborhoods.	Property acquisition by ST for station construction and staging theoretically creates more opportunity for TOD and affordable housing post-construction than CID-1a and 1b. ST's eTOD policy requires it to "prioritize affordable housing," however, mechanisms for accountability and proof of concept are unclear. The businesses that would be displaced under this option are primarily local small businesses, many owned by POCs. Replacement is not the same as enhancement.	Property acquisition by ST for station construction and staging theoretically creates more opportunity for TOD and affordable housing post-construction than CID-1a and 1b. ST's eTOD policy requires it to "prioritize affordable housing," however, mechanisms for accountability and proof of concept are unclear. The businesses that would be displaced under this option are primarily local small businesses, many owned by POCs. Replacement is not the same as enhancement.	The benefits of eTOD to the CID and PSQ are unclear here. An activated Union Station has the potential to invigorate the transit hub, provide a welcoming entry point to the cultural and business communities in PSQ and CID.
Encourage economic development and increase economic diversity in businesses and residents	4th Ave. alternatives put Union Station directly to use as a transportation hub, by serving as the location for the new light rail station entrance, and a connection between the existing and proposed stations. Using Union Station would be a first step toward activating the building for more public-facing use. There would be no apparent loss of on-street parking or commercial loading zones in the CID district resulting from construction staging activities.	Parcel impacts inside the CID neighborhood would serve as opportunity to redevelop existing parcels and buildings within the project footprint area. TOD opportunities are possible. During construction of the project, full closures of S. Weller and S. King St. between 5th and 6th Avenues would adversely impact small businesses on those blocks. Businesses would have difficulty receiving deliveries. Loss of on-street parking reduces access to residents and small business in the area. Depending on the level of impact to the pedestrian environment, the retail and restaurant storefronts would likely lose foot traffic and customers.	Parcel impacts inside the CID neighborhood would serve as opportunity to redevelop existing parcels and buildings within the project footprint area. TOD opportunities are possible. During construction of the project, full closures of S. Weller and S. King St. between 5th and 6th Avenues would adversely impact small businesses on those blocks. Businesses would have difficulty receiving deliveries. Loss of on-street parking reduces access to residents and small business in the area. Depending on the level of impact to the pedestrian environment, the retail and restaurant storefronts would likely lose foot traffic and customers.	Construction along 5th Ave. S. minimizes traffic issues for the region while expecting them to be born by blocks of businesses in a pedestrian-friendly, small ethnic neighborhood that already bears disproportionate burdens for the regional transportation system. Construction along 4th Ave. S. moves the burden of construction to the region rather than centering it in the CID.

Enhance public health and well-being	Station construction on 4th Ave. S. would introduce opportunties to enhance and improve the pedestrian environment in the 4th Ave./2nd Ave. Ext./S. Jackson St. area, which benefits PSQ, CID, and transit riders on all modes. Because 1a is cut-and-cover tunnel construction, it would be among the loudest options to construct (88dBa at 50 feet from source--the equivalent of a lawnmower or motorcycle), for durations of 4-6 years. Depending on the extent of 4th Ave. S. reconstruction, surface construction noise could still reach 84-89 dBA for bridge construction activities within 50 feet of a receiver. The Icon apartments would be the closest residents to construction activities. Depending on the state of the viaduct structures beneath 2nd Ave. Ext. S. and S. Jackson St., consolidating those rebuilding efforts could prevent multiple local, major construction projects in the same area. A tunnel ventilation system located in front of Union Station at the corner of 4th Ave. S. and S. Jackson St. would face residents of the Icon Apartments, and	Because 2a is a cut-and-cover tunnel construction, it would be among the loudest of the options (88dBa at 50 feet from source--the equivalent of a lawnmower or motorcycle), for durations of 4-6 years. Additionally, construction on 5th Ave. S. would move noise, dust and other pollution closer to where more people live and work. Construction in the heart of the CID would result in prolonged increase of heavy truck traffic to excavate and build the new station. Large trucks would travel through the small streets at a rate of 10-35 trucks per hour, 5 to 6 days per week, increasing pedestrian and resident exposure to heavy vehicle traffic, truck exhaust, noise, dust, and increased pedestrian/truck conflict at intersections. The new station infrastructure would span across two blocks, and a new tunnel ventilation system and stair egress would be located on the Nagomi Tea House property, which faces residents at the Uwajimaya Village to the south, Fujisada Condominium to the east, and Publix building to the west.	2a diagonal would be a mined station with reduced traffic impacts from CID-2a. This configuration is inconsistently addressed in the DEIS materials, and its impacts are not fully understood. Construction in the heart of the CID would result in prolonged increase of heavy truck traffic to excavate and build the new station. Large trucks would travel through the small St.s at a rate of 10-35 trucks per hour, 5 to 6 days per week, increasing pedestrian and resident exposure to heavy vehicle traffic, truck exhaust, noise, dust, and increased pedestrian/truck conflict at intersections. The new station infrastructure would span across two blocks, and a new tunnel ventilation system and stair egress would be located on the Nagomi Tea House property, which faces residents at the Uwajimaya Village to the south, Fujisada Condominium to the east, and Publix building to the west.	It is unclear if the Downtowner and Hirabayshi Place tenants, residential and commerical, would be affected by 4th Avenue construction. An assessment of noise impacts is necessary for all the options.
Acknowledge and address historic racism that has and continues to impact neighborhoods				While this community priority is acknowledged in passing in the Environmental Justice section, Appendix A of this letter contains a list of historic racist and governmental actions that have adversely mpacted the south downtown neighborhoods.
Activate common areas	4th Ave. S. Alternatives (CID-1a and 1b) put Union Station directly to use as a transportation hub, by serving as the location for the new light rail station entrance, and a connection between the existing and proposed stations. Using Union Station would be a first step toward activating the building for more public-facing use.	All 5th Ave. S. options create new common areas in the CID (replacing privately held properties) by building a new station entrance, ancillary building spaces, and bicycle storage along 5th and 6th Avenues S.	All 5th Ave. S. options create new common areas in the CID (replacing privately held properties) by building a new station entrance, ancillary building spaces, and bicycle storage along 5th and 6th Avenues S.	Any activation to be done by community organizations must be funded long-term.
Improve mobility and connectivity	Shallow options mean easier and more convenient transfers between light rail lines, and easier access to other transportation modes (bus routes, streetcar). 4th Ave station plans would provide station access on both the east and west sides of 4th Ave. 4th Ave. presents the most difficulties for current bus lines during construction; prioritization of transit maintenance will be important in construction management plans. Provides direct transit connection to both CID and PSQ neighborhoods. More direct connections to bus routes serving Georgetown, and existing access to Sounder and Amtrak	Shallow options mean easier and more convenient transfers between light rail lines, and easier access to other transportation modes (bus routes, streetcar). 5th Ave options provide slightly more direct connection to, streetcar, and bus routes serving Beacon Hill, Little Saigon, and Central District, but only one new entryway for the new station. Fifth Ave. S. options also require the rerouting of all Metro electric Trolley busses. Efforts to minimize the footprint of 5th Ave. S. station options is not compatible with the object of the Project resulting in a 100 year vision for the station, its connections, safety and activation.	Shallow options mean easier and more convenient transfers between light rail lines, and easier access to other transportation modes (bus routes, streetcar). 5th Ave.options provide slightly more direct connection to, streetcar, and bus routes serving Beacon Hill, Little Saigon, and Central District, but only one new entryway for the new station. Fifth Ave. S. options also require the rerouting of all Metro electric Trolley busses. Efforts to minimize the footprint of 5th Ave. S. station options is not compatible with the object of the Project resulting in a 100 year vision for the station, its connections, safety and activation.	Maintenance of bus routes should be a priority in construction management plans regardless of the alignment chosen. Construction along 4th Ave.should come with the opportunity to explore ways to enhance pedestrian infrastructure.
Retain historic and cultural character	Approximately 20-foot tall tunnel vent placed in front of Union Station, which will havevisual impacts and conflicts with Pioneer Square Preservation Board regulations.	Demolition of 418 5th Ave. S. (which houses multiple small businesses), Nagomi Plaza (519 6th Ave.S), and 525 S. Jackson Street (Seattle 1st National Bank--International District Branch), which are considered historic buildings.	Demolition of 418 5th Ave. S. (which houses multiple small businesses), Nagomi Plaza (519 6th Ave.S), and 525 S. Jackson Street (Seattle 1st National Bank--International District Branch), which are considered historic buildings. Additional impacts for this alignment include temporary closures of both the historic American Hotel and the history Buty Building for	A review of historic district regulations should be done to see how Union Station reuse plans and ventilation needs for the tunnel can be planned to minimize adverse effects to the historic building.

Support a small business environment	All options provide new underground connections between light rail stations, which could potentially reduce pedestrian traffic to small business in the vicinity of the stations. Reinvigoration of Union Station as a a passenger terminal building creates feasible, sustainable options for integration of promotion of neighborhood businesses. For example, a local coffee shop could staff a coffee cart, or the Wing Luke and Klondike National Park could share a kiosk to promote their museums, offer tours. All stations would result in a small conversion of parking along 5th Ave. S, to passenger load for transit. 4th Ave. S. Alternative and Option would not result in any additional on-street parking loss during construction or operations. This option would impact approximately 200 parking spaces of the 1,086 stall Union Station Parking Garage.	All options provide new underground connections between light rail stations, which could reduce pedestrian traffic to small business in the vicinity of the stations. Reuse of Union Station would be harder absent an authentic need for people to walk in and out of the building. The City of Seattle, the Community and other stakeholders have - quite literally - been studying ways to reuse Union Station as a community ammenity for 50 YEARS without success. It is clear that successful reuse of the building would require a great deal of expense in terms of consulting and long term operational support. All stations would result in a small conversion of parking along 5th Ave. S, to passenger load for transit. CID-2a would result in a temporary loss of on-street parking within the CID neighborhood, which is known to reduce traffic to small businesses. The complete closure of S. King St. and S. Weller St. would have direct impacts on small businesses that would not be actually displaced by construction. This option would impact all surface lot parking at the 6th and King parking lot, and the Bank of America parking lot on 6th Avenue. Surface level and on-street parking is important to residents and small	All options provide new underground connections between light rail stations, which could reduce pedestrian traffic to small business in the vicinity of the stations. Reuse of Union Station would be harder absent an authentic need for people to walk in and out of the building. The City of Seattle, the Community and other stakeholders have - quite literally - been studying ways to reuse Union Station as a community ammenity for 50 YEARS without success. It is clear that successful reuse of the building would require a great deal of expense in terms of consulting and long term operational support. All stations would result in a small conversion of parking along 5th Ave. S, to passenger load for transit. CID-2a would result in a temporary loss of on-street parking within the CID neighborhood, which is known to reduce traffic to small businesses. The complete closure of S. King St. and S. Weller St. would have direct impacts on small businesses that would not be actually displaced by construction. This option would impact all surface lot parking at the 6th and King parking lot, and the Bank of America parking lot on 6th Avenue. Surface level and on-street parking is important to residents and small	Construction will affect the business environment, but much less so if aligned to 4th Ave. S. than to 5th Ave. S. Indirect impacts can be addressed through support and information, while construction cutting off pedestrian access or "temporary" 9 month business closures will adversely affect the local business district.
Ensure that people across Seattle and the region continue to visit the neighborhoods, even during construction	Longer construction durations than 5th Avenue alternatives. No direct interruption of access from existing light rail to CID neighborhood during construction. Increased "barrier" of construction between CID and Pioneer Square neighborhoods. Pedestrian detours to get around construction may increase the walking distance and result in avoidance. Transit users may choose other stations to disembark to access Pioneer Square or Waterfront during construction.	Temporary but high impact (noise, dust vibration) construction effects on Hing Hay Park (construction will be across the street); temporary impacts to Uwajimaya Village, including loading dock, parking garage, and entrance plaza. Pedestrian detours needed from existing light rail station to CID would be long, and could potentially create a barrier to visiting CID during construction.	Temporary but high impact (noise, dust vibration) construction effects on Hing Hay Park (construction will be across the street) and neighborhood residents directly adjacent to station construction. Pedestrian detours needed from existing light rail station to CID would be long, and could potentially create a barrier to visiting CID during construction.	The CID and PSQ experienced disproportionate impacts from the COVID-19 pandemic, and extensive on-going public projects that preceded the pandemic. Temporary mitigation during construction would need to include signage, promotion, and other necessary support for small businesses.

Appendix C

Ballard Link Extension

Denny Station status report

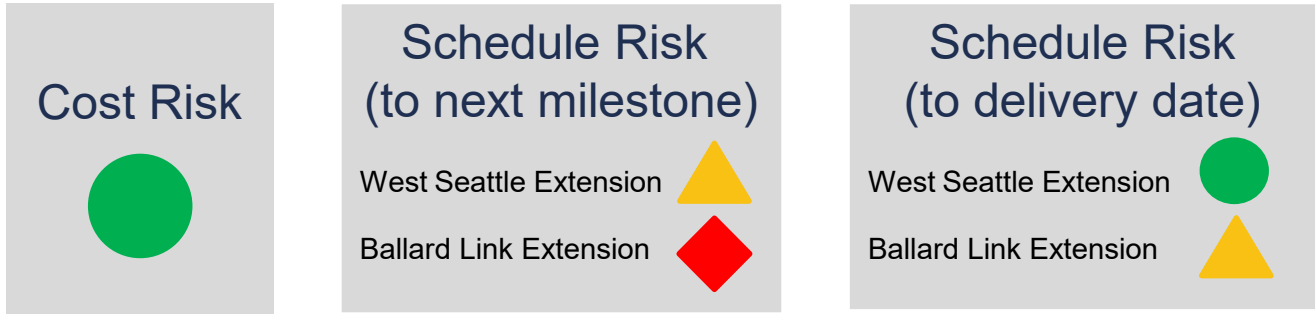
Board of Directors
7/27/23

SoundTransit

Why we're here today

- Brief recap of May status report to Board on Denny Station
- Overview of assessment of ridership, access, equity and large events
- Overview of community feedback
- Potential board action to modify preferred alternative in Denny station area

Cost and schedule risks



Cost Risks

- Additional cost elements of preferred alternative dependent on third party funding.
- Potential for additional costs associated with permitting requirements.
- Potential impacts from higher real estate and construction costs.
- Potential that design or construction challenges could emerge as work progresses.

Schedule Risks

- Potential additional environmental process delays.
- Potential permitting challenges and other necessary coordination/approvals associated with water crossing.
- Potential schedule risks associated with real estate acquisition process.
- Potential risk in processing reviews/approvals with permitting authorities in a timely manner.

Environmental process next steps

- West Seattle and Ballard Link Extensions Draft EIS was published in January 2022
- Both extensions were initially on the same environmental review timeline
- Additional environmental review needed for project refinements for Ballard Link Extension resulting from Board action in March 2023
- Environmental review for the two extensions will now proceed on different timelines
  - West Seattle Link Extension will proceed to a Final EIS
  - Ballard Link Extension will require a SEPA Supplemental Draft EIS/NEPA Draft EIS

    (incorporating all work to date including previous comments, public outreach and environmental analysis)

Recap of May status report

Ballard Link Extension preferred alternative

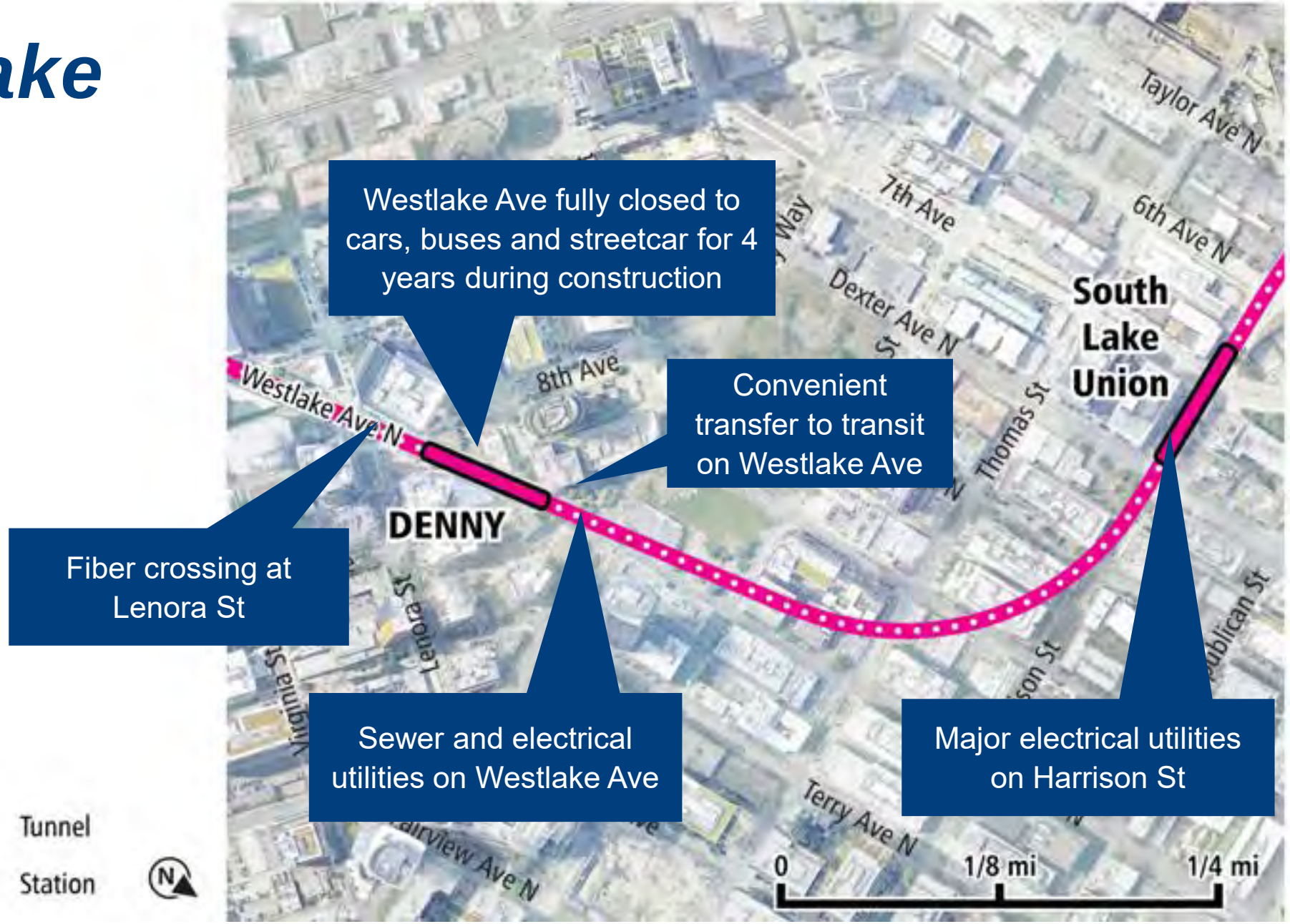
SoundTransit

March Board action

Motion No. M2023-18

While the previously-identified preferred alternative is not modified at this time, staff is directed to **carry forward both the Denny Station on Westlake** (DT1) Draft EIS Station alternative **and Denny Station on Terry** (i.e. South Lake Union Mix and Match) alternative as part of ongoing environmental review. Staff is directed to continue collaboration with City of Seattle and community partners to **further clarify the technical, financial, schedule and risk implications of both alternatives** and return to the Board with a **status report by May 25, 2023**.

Denny Westlake
Draft EIS DT-1



All costs are rounded in $2019. Comparative estimates based on limited design to inform comparison of concepts.

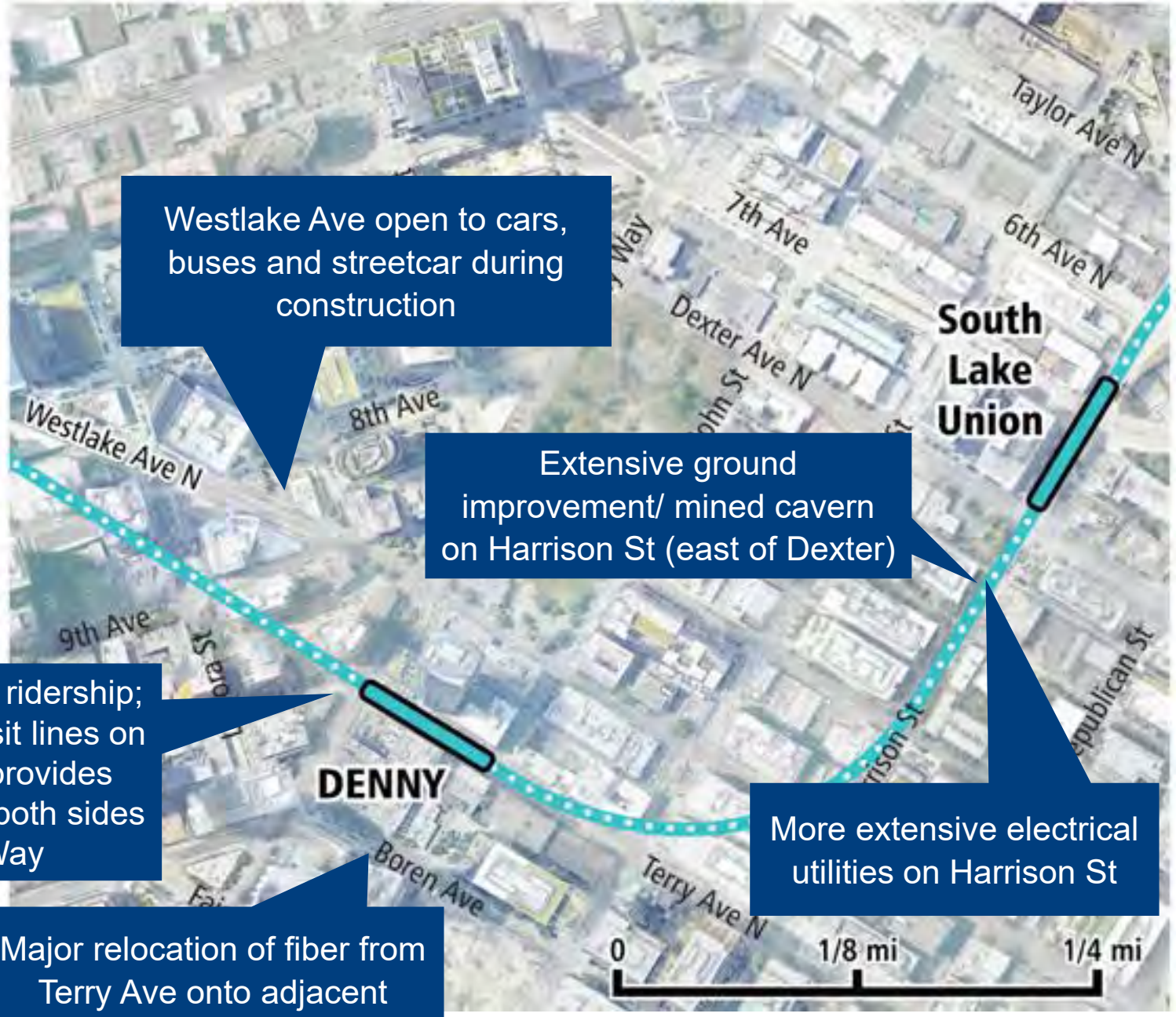
SoundTransit

Denny Terry
SLU Mix-Match

$340m additional cost

Uncertainty of fiber relocation could delay overall schedule

Substantial disruption and litigation risk if inadvertently cut fiber lines


Westlake Ave open to cars, buses and streetcar during construction
Extensive ground improvement/ mined cavern on Harrison St (east of Dexter)
Minimal impact to ridership; short walk to transit lines on Westlake Ave; provides station access to both sides of Denny Way
More extensive electrical utilities on Harrison St
Major relocation of fiber from Terry Ave onto adjacent streets (Boren, Denny)
Taylor Ave N
6th Ave N
7th Ave
Dexter Ave N
8th Ave
Westlake Ave N
9th Ave
South Lake Union
DENNY
Boren Ave
Terry Ave N
Republican St
Tunnel
Station
N
0
1/8 mi
1/4 mi

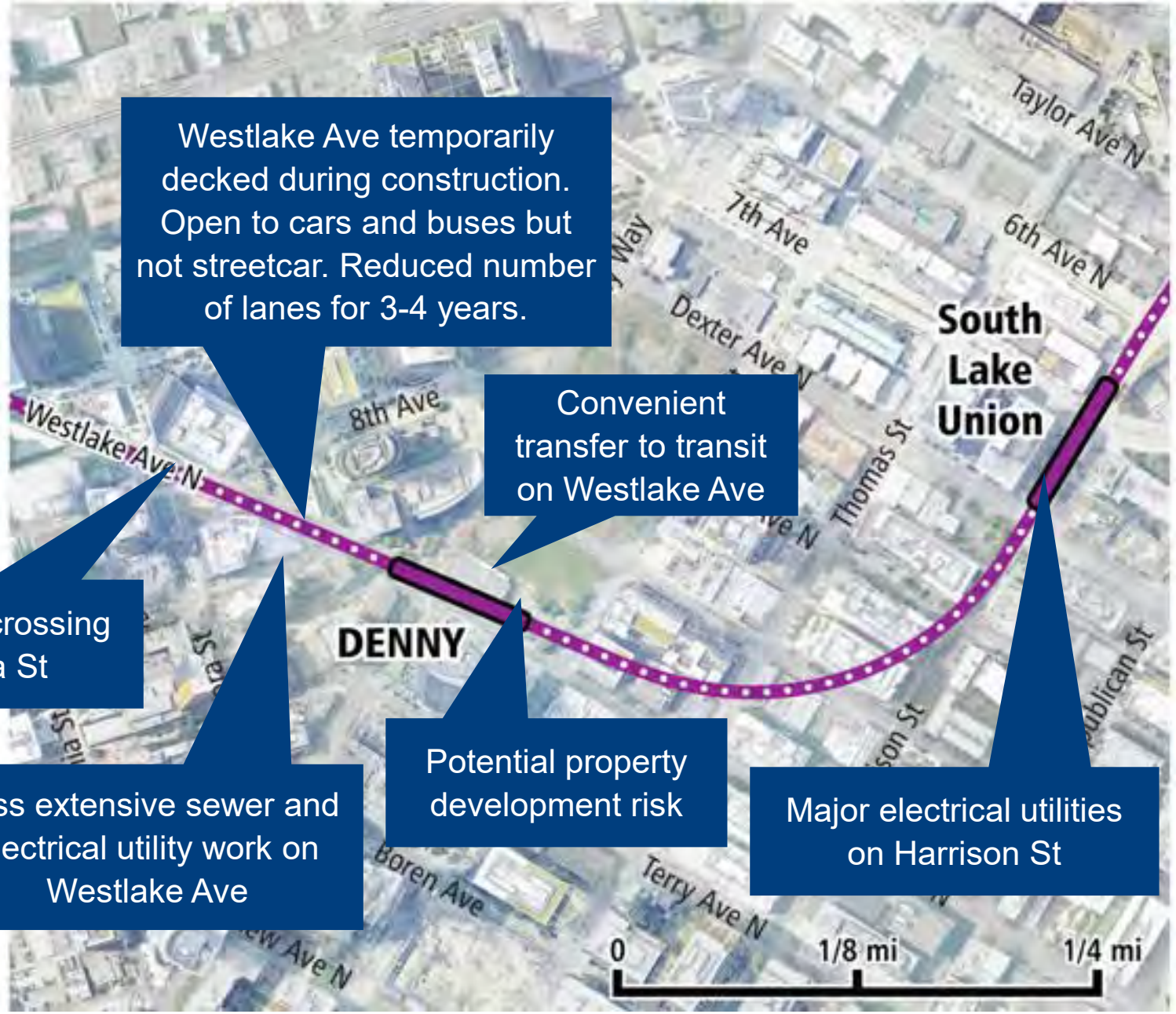
All costs are rounded in $2019. Comparative estimates based on limited design to inform comparison of concepts.

SOUNDTRANSIT

Denny Westlake Shifted North

$170m additional cost*

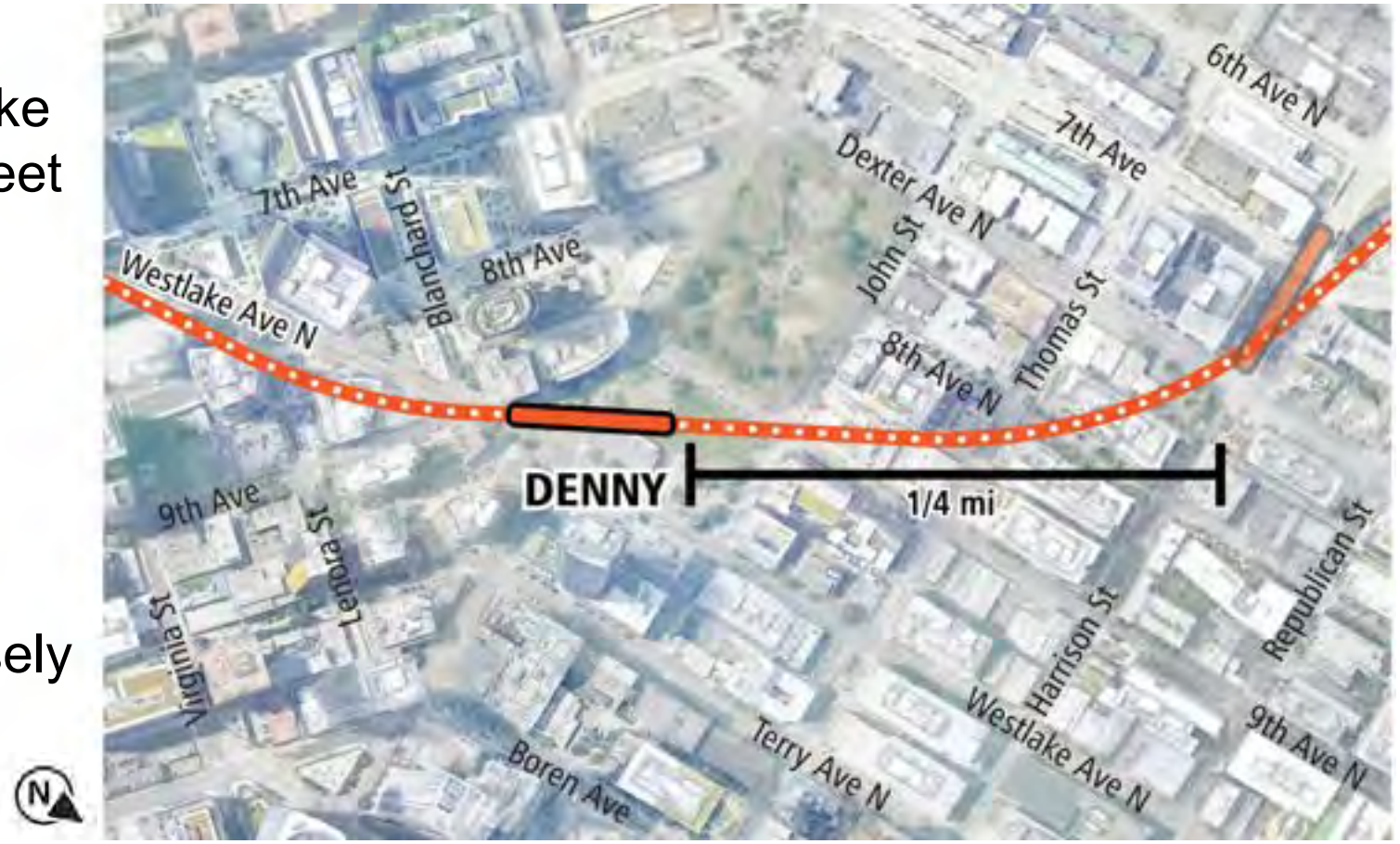
Phased in-street construction to maintain traffic adds construction complexity and extends duration of street effects (8 years vs 4 years)



All costs are rounded in $2019. Comparative estimates based on limited design to inform comparison of concepts.
* Assumes full acquisition of Block 48 property (~$200m)

Denny Westlake
Shifted West

- To further avoid impacts to Westlake Ave, shifted station west out of street right of way onto private property
- Resulted in very close spacing to Harrison St station with geometric and technical constraints
- Hence, considered consolidated station concept instead of two closely spaced stations

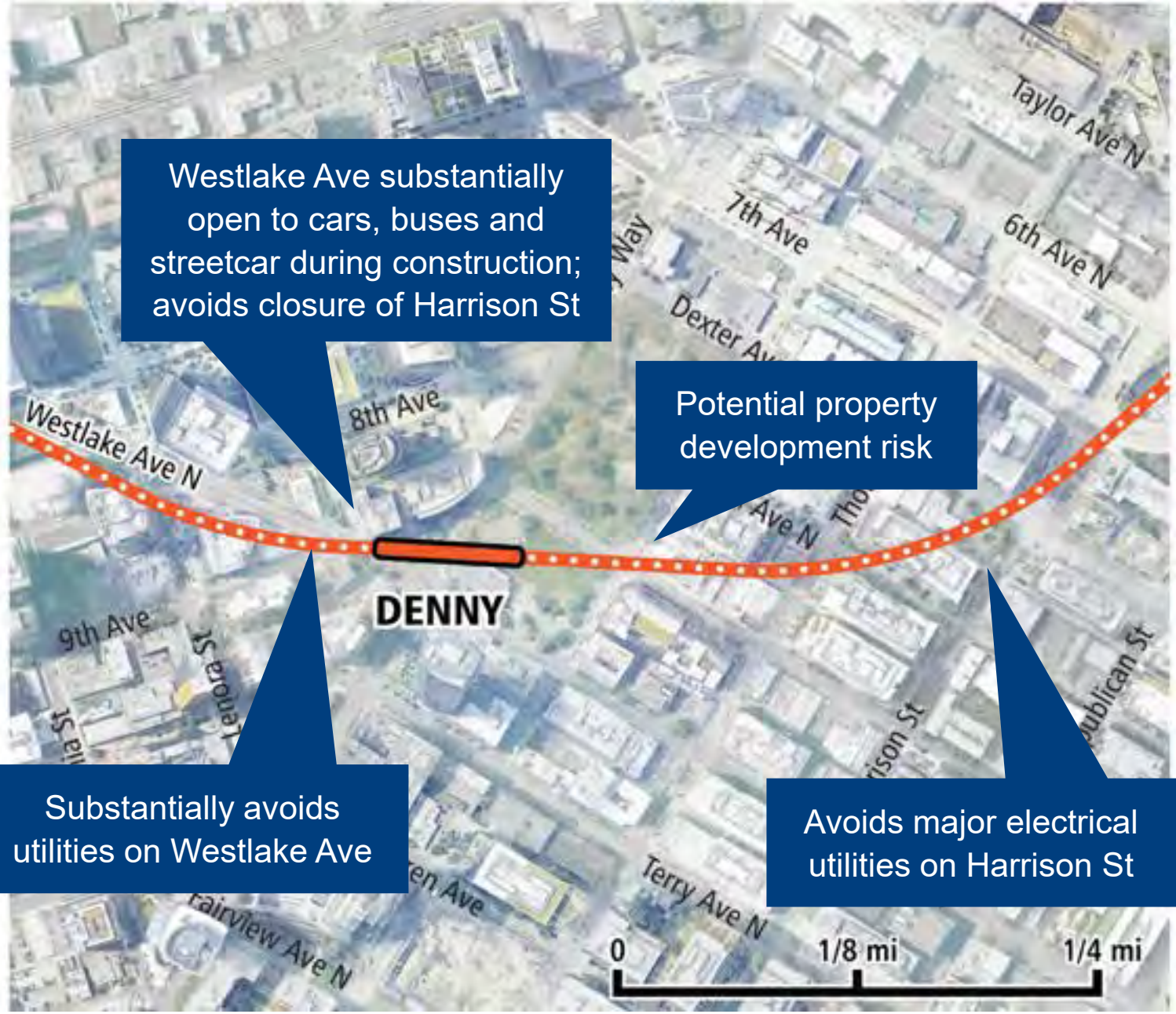


Denny Westlake
Shifted West

$440m cost savings due to consolidation of Denny and Harrison St stations*

Potentially shorter station construction duration due to improved site access and mostly off-street construction

Ridership, transit integration and passenger experience implications of consolidated station to be further assessed



All costs are rounded in $2019. Comparative estimates based on limited design to inform comparison of concepts.
* Assumes full acquisition of Block 48 property (~$200m)

Lower performing — Higher performing

	Denny Westlake	Denny Terry	Denny Westlake refinement options	
	Draft EIS (DT-1)	**SLU Mix-Match**	**Shifted North**	**Shifted West**
Technical *street closures*	Westlake Ave fully closed to cars, buses and streetcar for 4 years during construction	Westlake Ave open to cars, buses and streetcar during construction	Westlake Ave temporarily decked during construction. Open to cars and buses but not streetcar. Reduced number of lanes for 3-4 years.	Westlake Ave substantially open to cars, buses and streetcar during construction; avoids closure of Harrison St
utilities	Sewer and electrical utilities on Westlake Ave; fiber crossing at Lenora St; major electrical utilities on Harrison St	Major relocation of fiber from Terry Ave onto adjacent streets (Boren, Denny); more extensive electrical utilities on Harrison St	Less extensive sewer and electrical utility work on Westlake Ave; avoids fiber crossing at Lenora St; major electrical utilities on Harrison St	Substantially avoids utilities on Westlake Ave and completely avoids major electrical utilities on Harrison St
constructability	Base case for constructability comparison	Extensive ground improvement/mined cavern on Harrison St (east of Dexter)	Phased in-street construction to maintain traffic adds construction complexity and extends duration of street effects (8 years vs 4 years)	Potentially shorter station construction duration due to improved site access and mostly off-street construction
Performance *ridership, transit integration, passenger experience*	Convenient transfer to transit on Westlake Ave	Minimal impact to ridership; short walk to transit lines on Westlake Ave; provides station access to both sides of Denny Way	Convenient transfer to transit on Westlake Ave	*To be assessed*
Cost *compared to Denny Westlake Draft EIS DT-1*	Base case for cost comparison	$340m additional cost	$170m additional cost*	$440m cost savings due to consolidation of Denny and Harrison St stations*
Schedule *overall project delay*	Base case for schedule comparison	Uncertainty of fiber relocation could delay overall schedule	No delay to overall schedule	No delay to overall schedule
Risk *substantial cost, schedule, or feasibility risks*	Base case for risk comparison	Substantial disruption and litigation risk if inadvertently cut fiber lines	Potential property development risk	Potential property development risk; avoids major electrical utilities on Harrison St

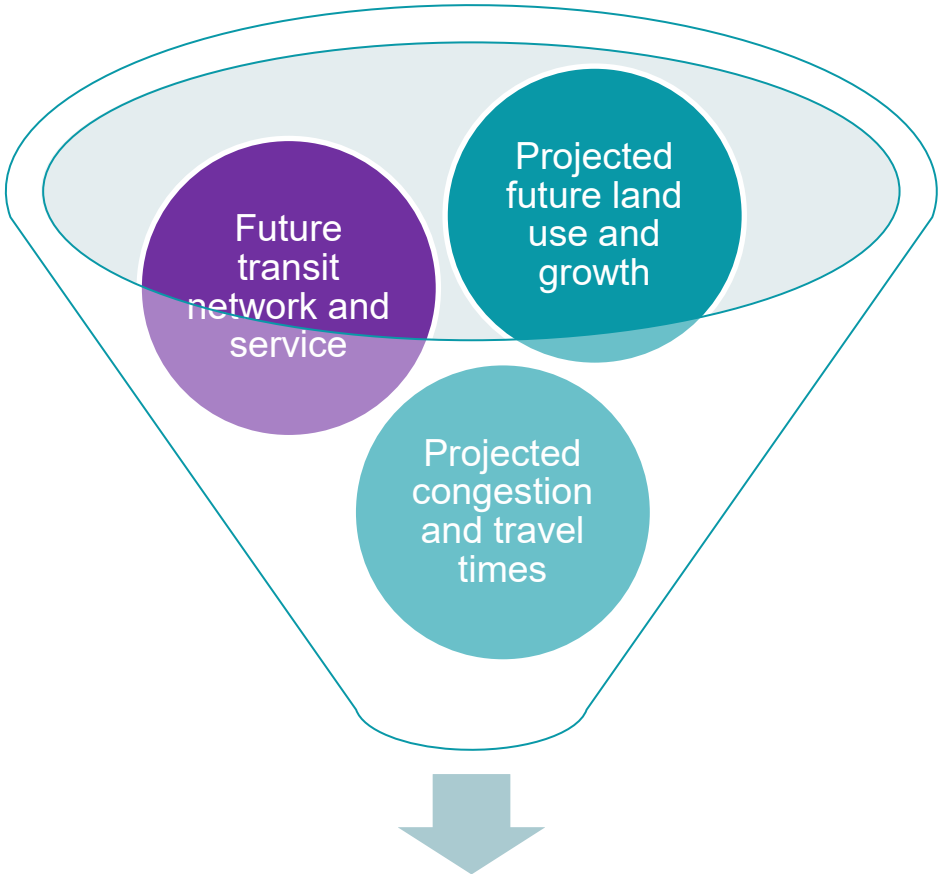
Results comparison

All costs are rounded in $2019. Comparative estimates based on limited design to inform comparison of concepts.
* Assumes full acquisition of Block 48 property (~$200m)

Results for ridership, access, equity, and large events

Ridership Modelling

Key model inputs:



Ridership estimates

Transit Integration:
Draft EIS

- **80% of all bus-rail transfers at SLU are related to four routes:**
  - ***1001*** *(E Line)*
  - ***1005*** *(similar to Route 5) Downtown-Fremont-Greenwood*
  - ***1202*** *(similar to Route 62) Downtown-Wallingford-Sand Pt*
  - ***1061*** *(similar to Route 8/11) Interbay-Capitol Hill-Madison Park*

- **Bus-rail transfers are about 32% of total boardings at South Lake Union Station; 12% at Denny Station**

SOUNDTRANSIT

Transit Integration:
Draft EIS

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- Bus-rail transfers are about 32% of total boardings at South Lake Union Station; 12% at Denny Station

Potential to integrate with Denny Station

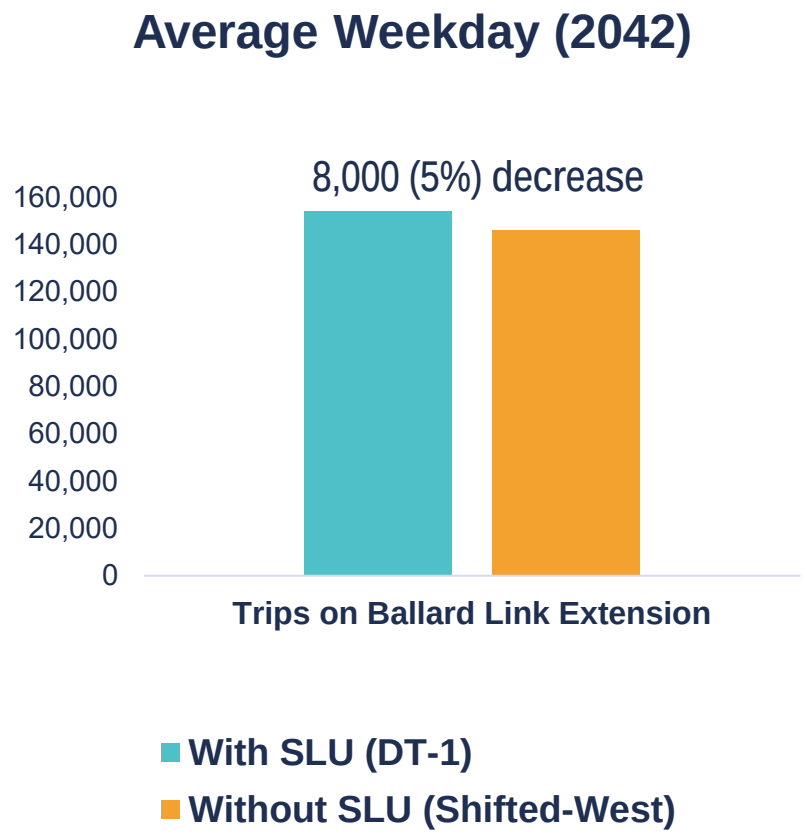
**Would require dedicated bus lanes on Denny Way and improvements to adjacent network roads. Feasibility of dedicated bus lanes on Denny is highly uncertain at this time*

If Denny Westlake – Shifted West moves forward, further analysis is needed by Sound Transit, King County Metro, and the City of Seattle, including 1) route deviation analysis to understand impact to transferring vs through riders and 2) Analysis of bus routing constraints, including geometric constraints, pavement conditions, and speed & reliability needs (i.e., bus lanes, queue jumps, TSP)

Ridership modeling results

What would happen if the Denny and SLU stations were consolidated…

Overall transit ridership would remain steady[1] but **fewer people would choose to ride Link**. Riders would instead choose to ride the bus or would stay on the bus and not transfer to Link.

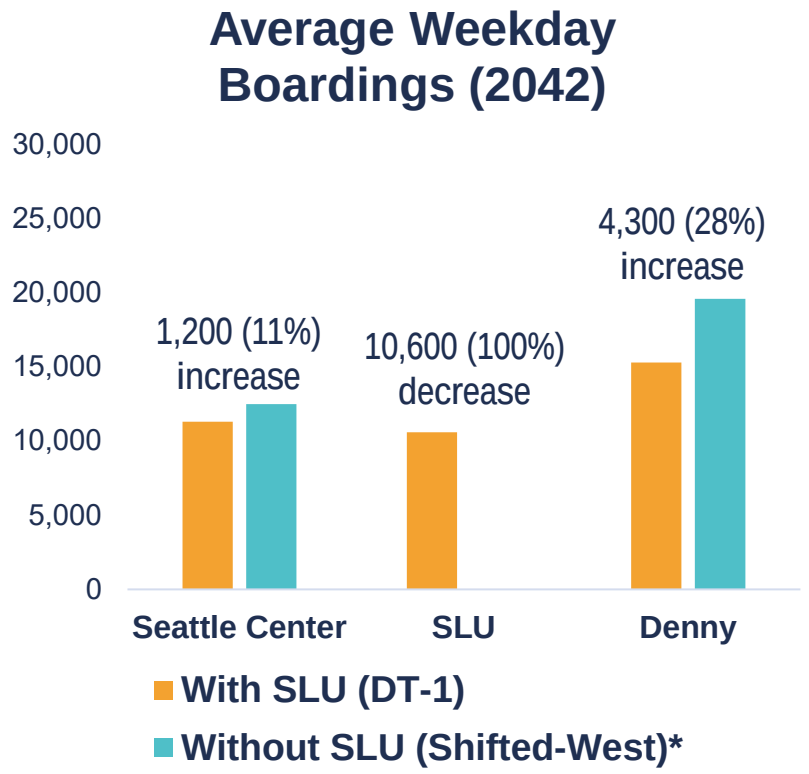


[1] Decrease of 1,000 (or 0.1%) transit trips

Ridership modeling results

How do travel patterns shift in SLU area…

Approximately **half of projected boardings expected at SLU Station shift to Seattle Center and Denny Stations** in Shifted West Scenario. Remaining boardings mostly shift to bus. Overall boardings on Link drop by ~10k.



* There would be no SLU station boardings because, under a Shifted West concept, it would be consolidated with the Denny Station

Ridership modeling results

How trips could change…

Someone who rides the E Line from the north into downtown might have transferred to Link at SLU for the remainder of their trip but instead chooses to stay on the bus to access their destination

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Ridership modeling results

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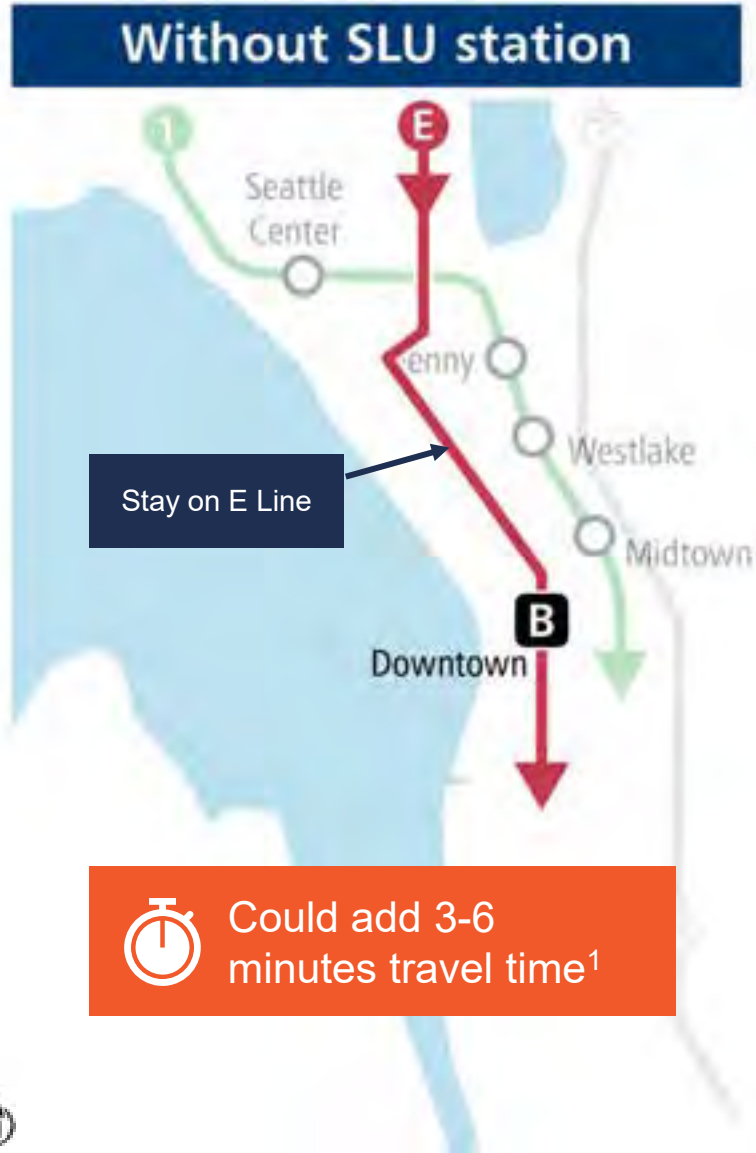
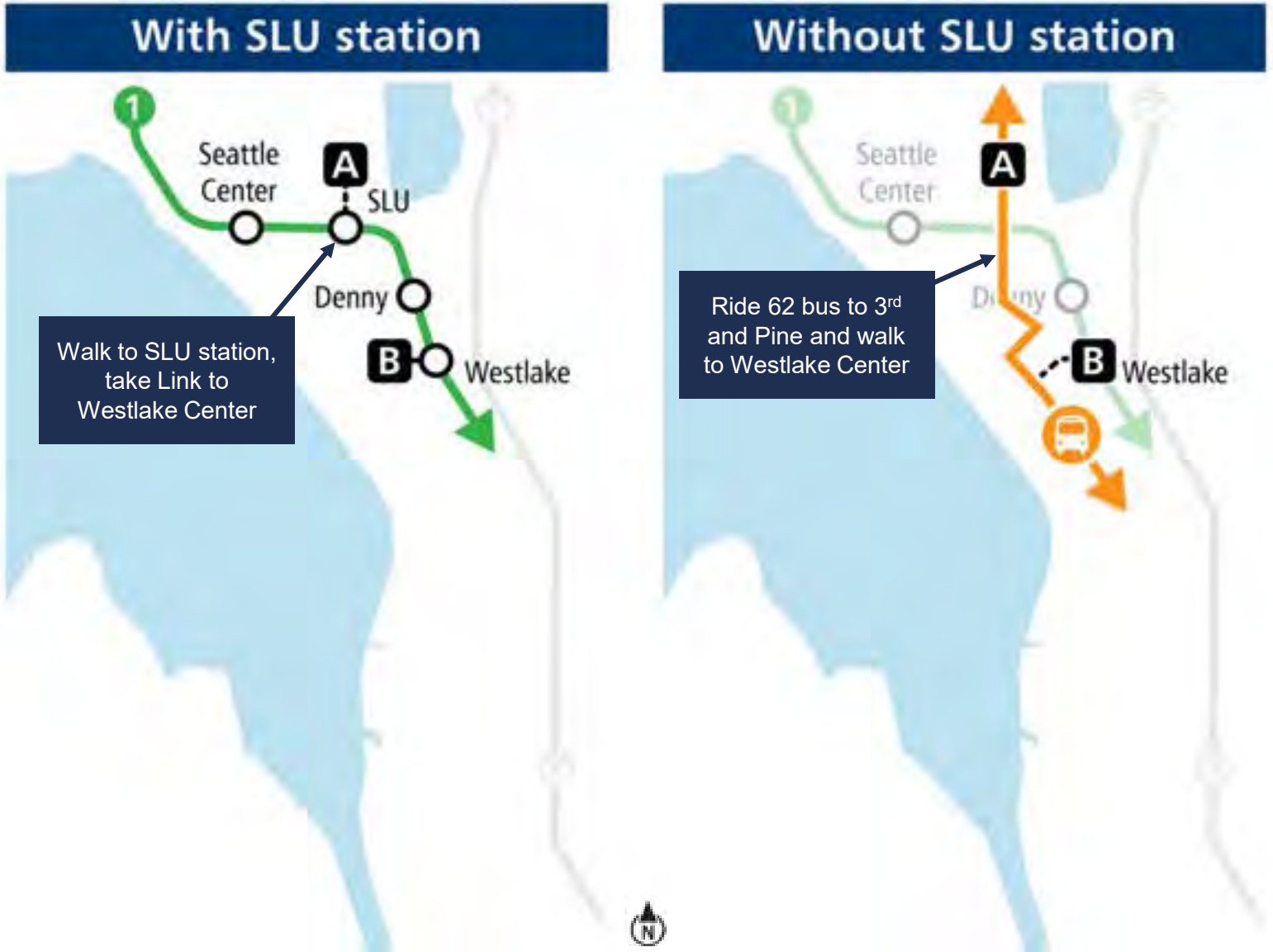


[1] Low end of range reflects trip on bus, high end reflects trip on Link. Bus travel times subject to variable speed and reliability.

Ridership modeling results

How trips could change…

Someone at Dexter and Mercer who might have chosen Link to get to Westlake Center via a 3-minute walk to the SLU station instead chooses to ride the 62 bus



Ridership modeling results

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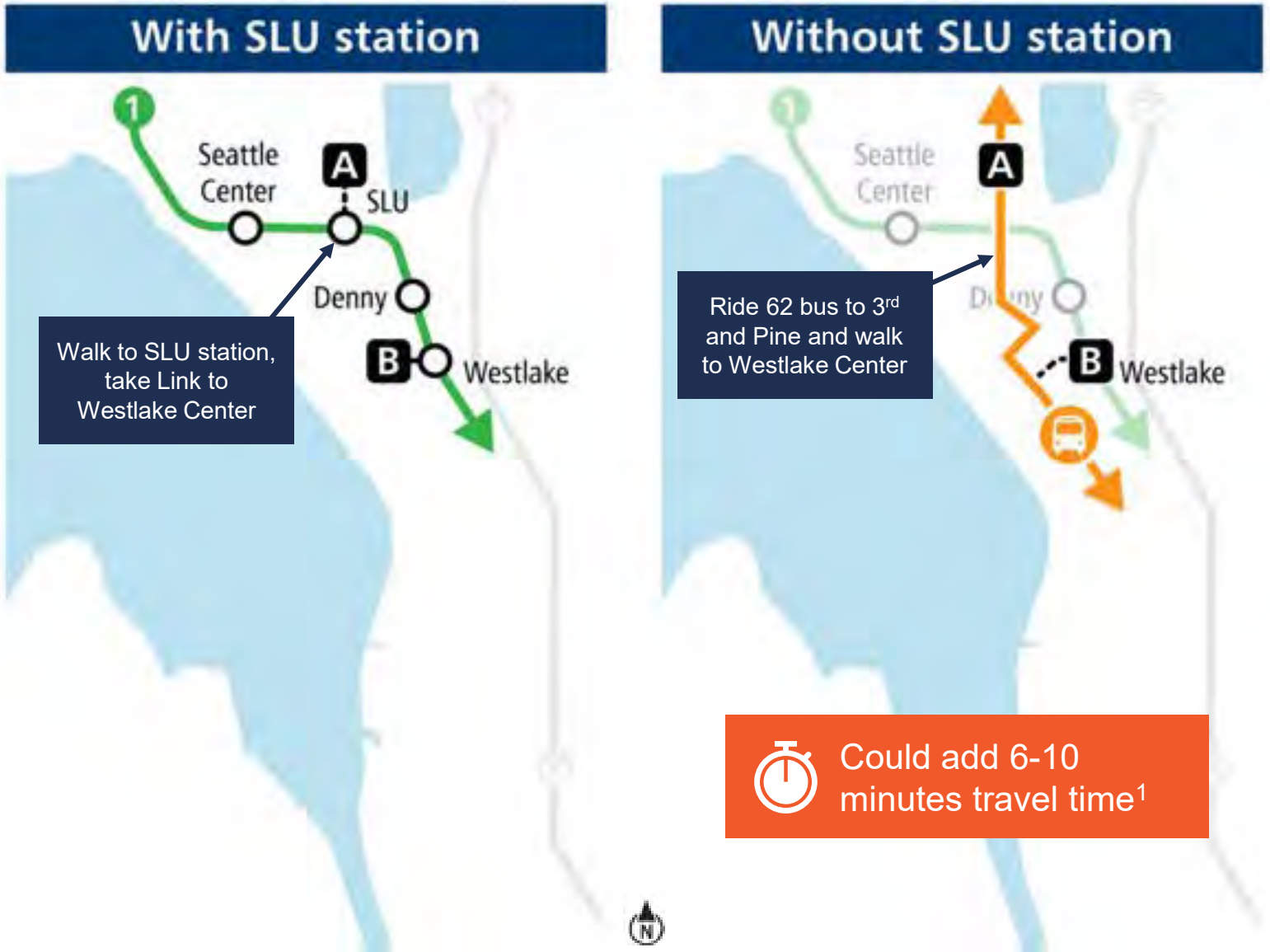
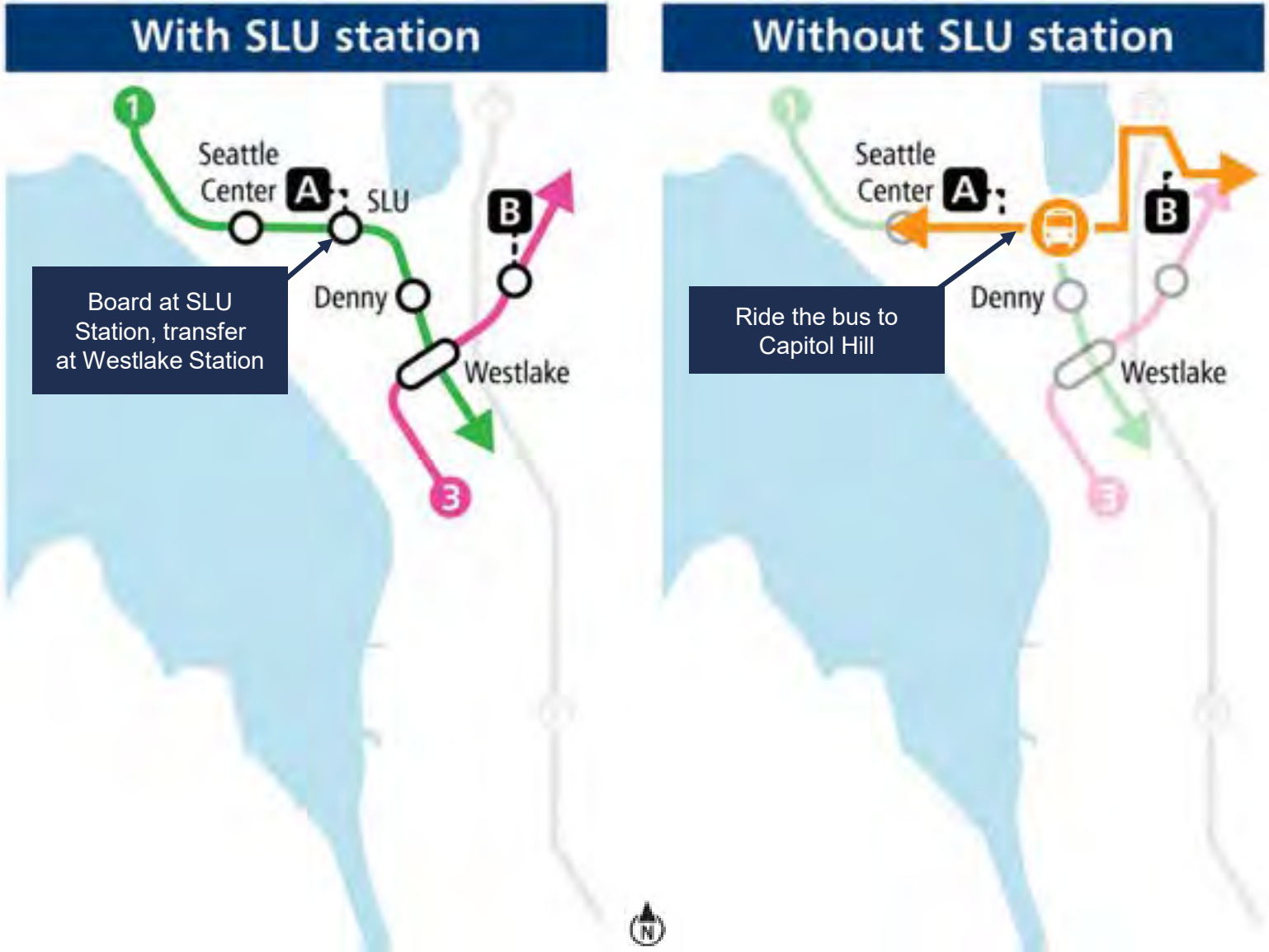


[1] Low end of range reflects trip on Link, high end reflects trip on bus. Bus travel times subject to variable speed and reliability.

Ridership modelling results

How trips could change…

Someone at Dexter and Harrison going to Capitol Hill might have boarded Link at SLU station would instead ride METRO CONNECTS Route 3028/3104 to Capitol Hill



Ridership modelling results

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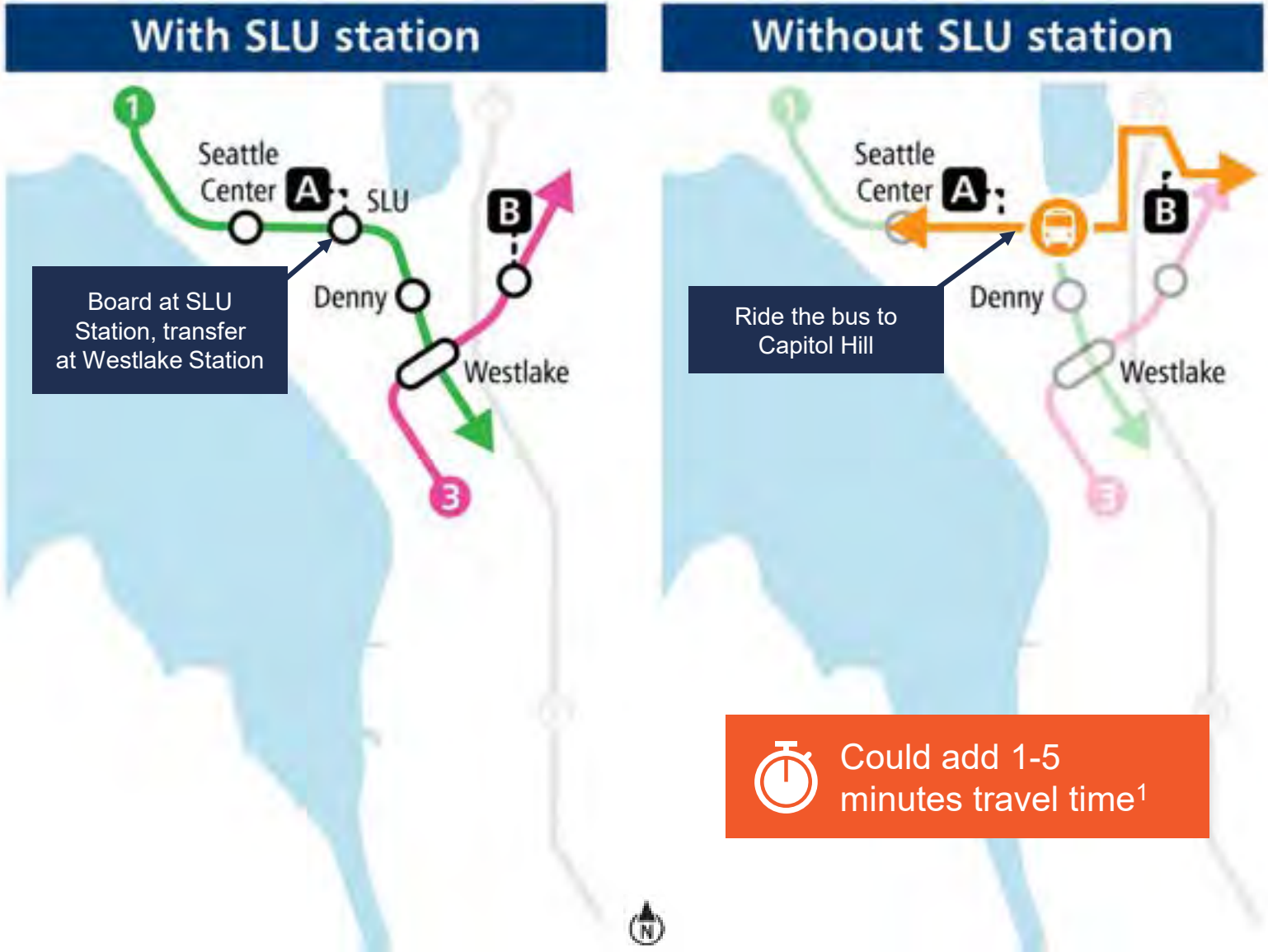
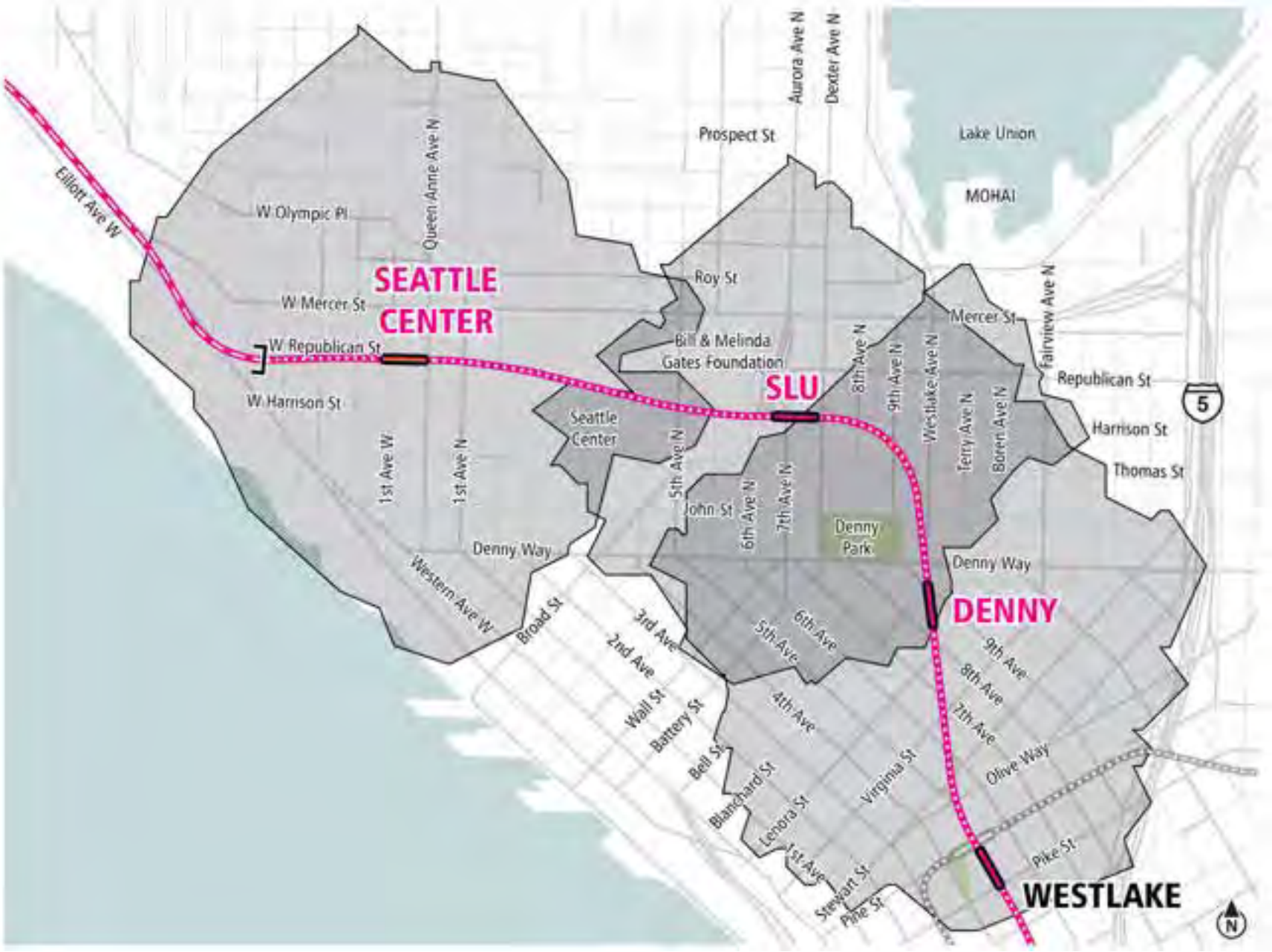


[1] Low end of range reflects trip on bus, high end reflects trip on Link. Bus travel times subject to variable speed and reliability.

Walk access

10-minute Walksheds*

With SLU



*Combines walksheds “to” and “from” station entrances

10-minute Walksheds*

Without SLU

*Combines walksheds “to” and “from” station entrances

Walk time to nearest 1-Line station*:

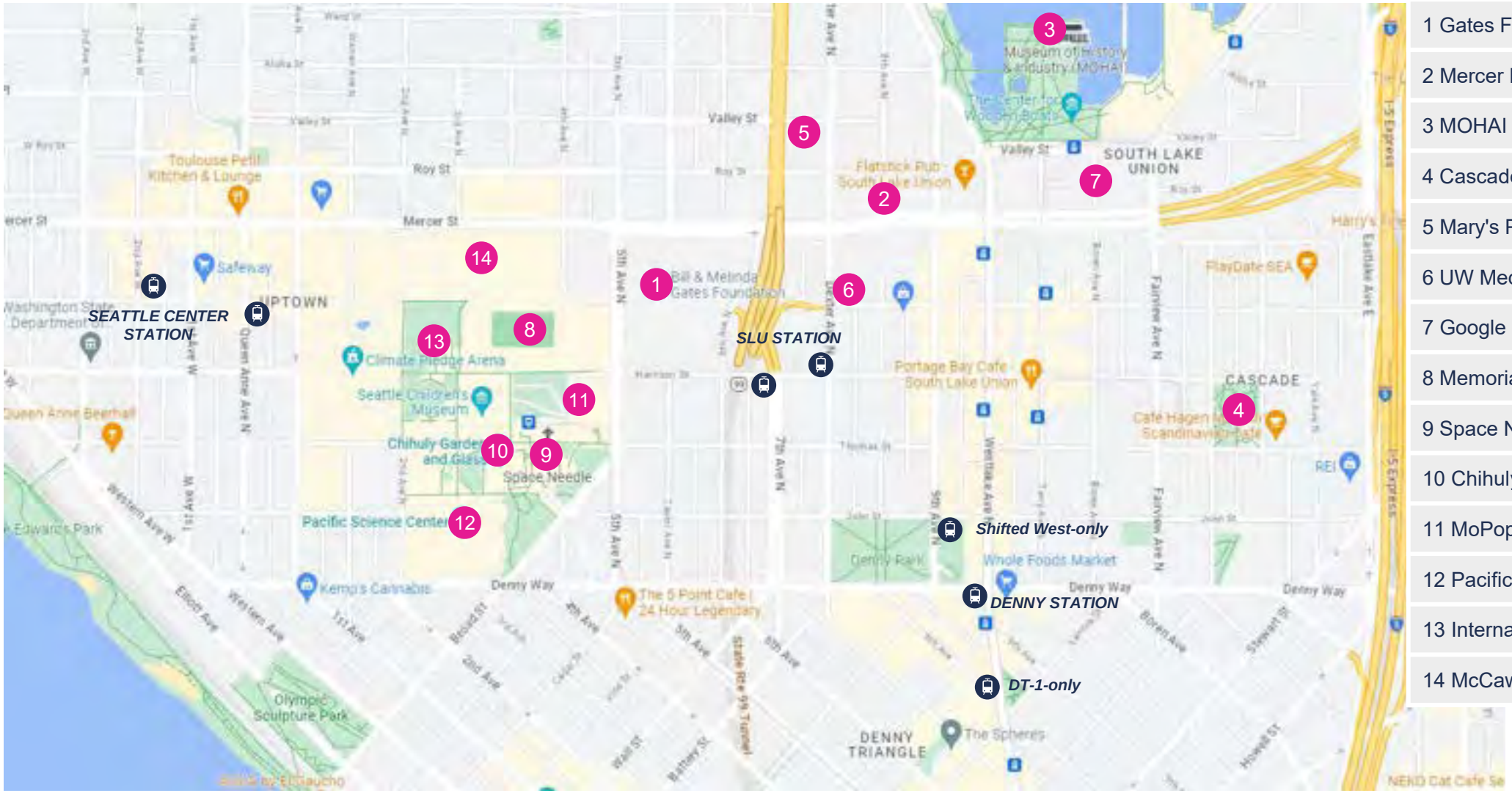
5+ min difference

	With SLU	Without SLU	Notes
1 Gates Foundation	2 min	10 min	Walk to Denny (shifted west) instead of SLU. Would introduce additional arterial crossings for Gates Foundation (7th Ave and Dexter Ave) and Mary's Place (Dexter Ave).
2 Mercer Mega Block	6 min	12 min	
3 MOHAI	14 min	15 min	
4 Cascade Playground	10 min	10 min	
5 Mary's Place	7 min	12 min	
6 UW Medicine Primary Care	2 min	8 min	
7 Google	12 min	12 min	
8 Memorial Stadium	6 min	6 min	Walk to Seattle Center rather than either Seattle Center or SLU
9 Space Needle	7 min	10 min	Walk to Seattle Center rather than SLU. Walking to Seattle Center station would involve fewer arterial crossings.
10 Chihuly Gardens & Glass	8 min	10 min	
11 MoPop	4 min	10 min	
12 Pacific Science Center	10 min	10 min	Walk to Seattle Center in both scenarios
13 International Fountain	6 min	6 min	
14 McCaw Hall	6 min	6 min	

Local access

*Walk times are approximate based on an example walking route and do not account for all passengers' preferences

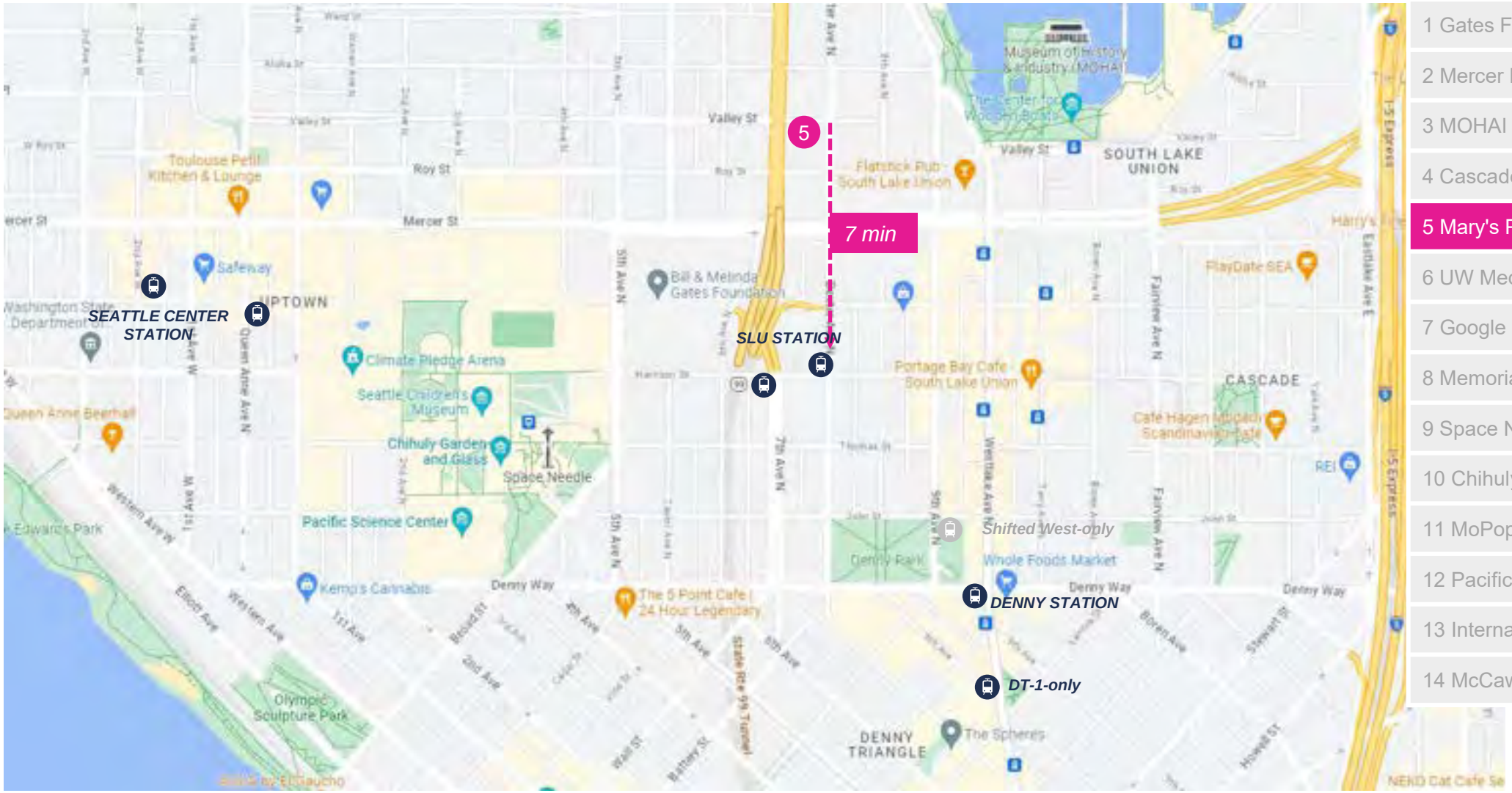
Walk Access*



1 Gates Foundation
2 Mercer Mega Block
3 MOHAI
4 Cascade Playground
5 Mary's Place
6 UW Medicine Primary Care
7 Google
8 Memorial Stadium
9 Space Needle
10 Chihuly Gardens & Glass
11 MoPop
12 Pacific Science Center
13 International Fountain
14 McCaw Hall

*Representative locations for illustrative purposes only. Does not reflect all potential destinations. Destinations to the south of Denny Way (e.g., Amazon) not highlighted as within walksheds of Denny and/or Westlake Stations.

Walk Access – with SLU



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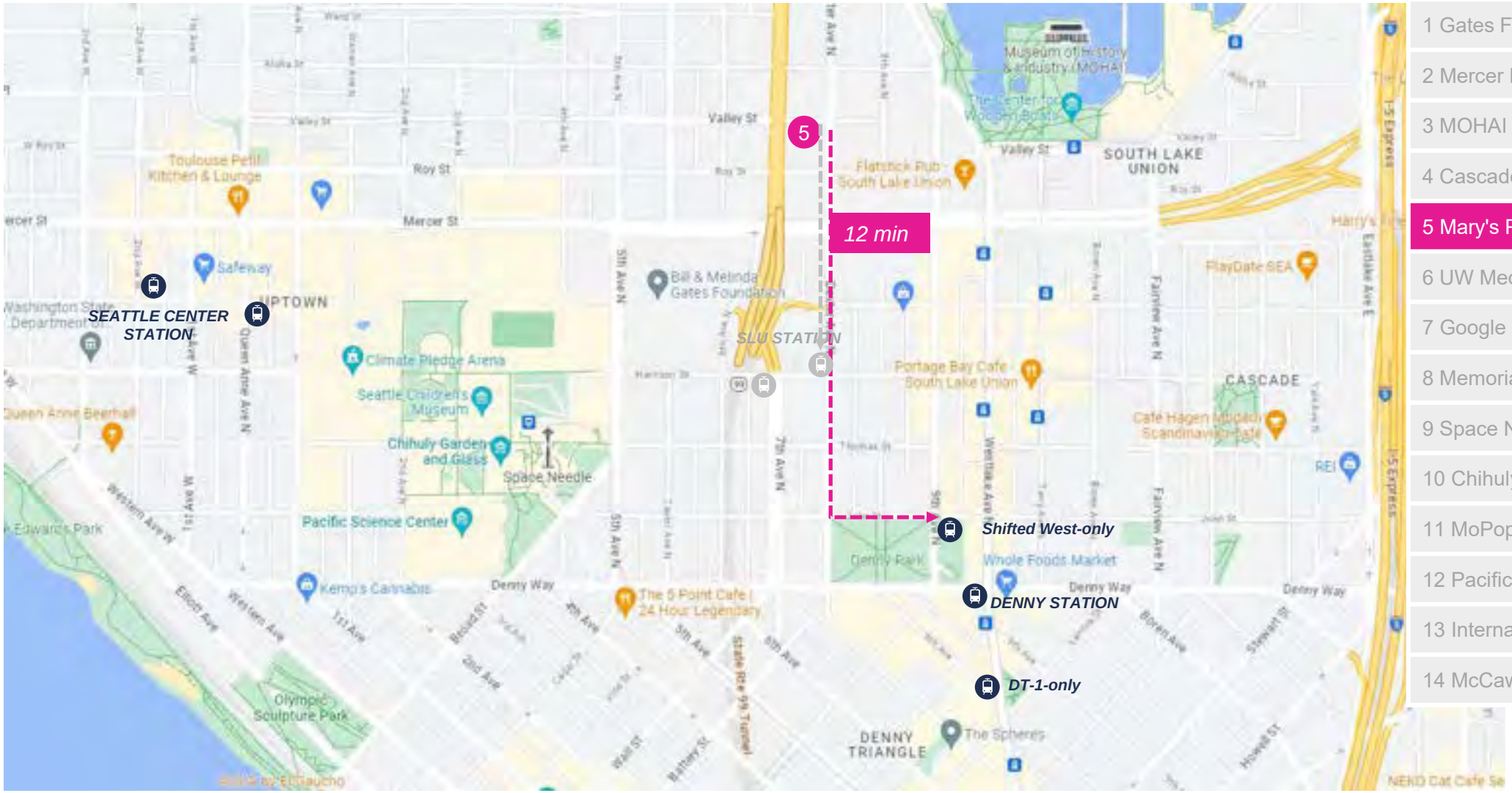
Walk Access – without SLU



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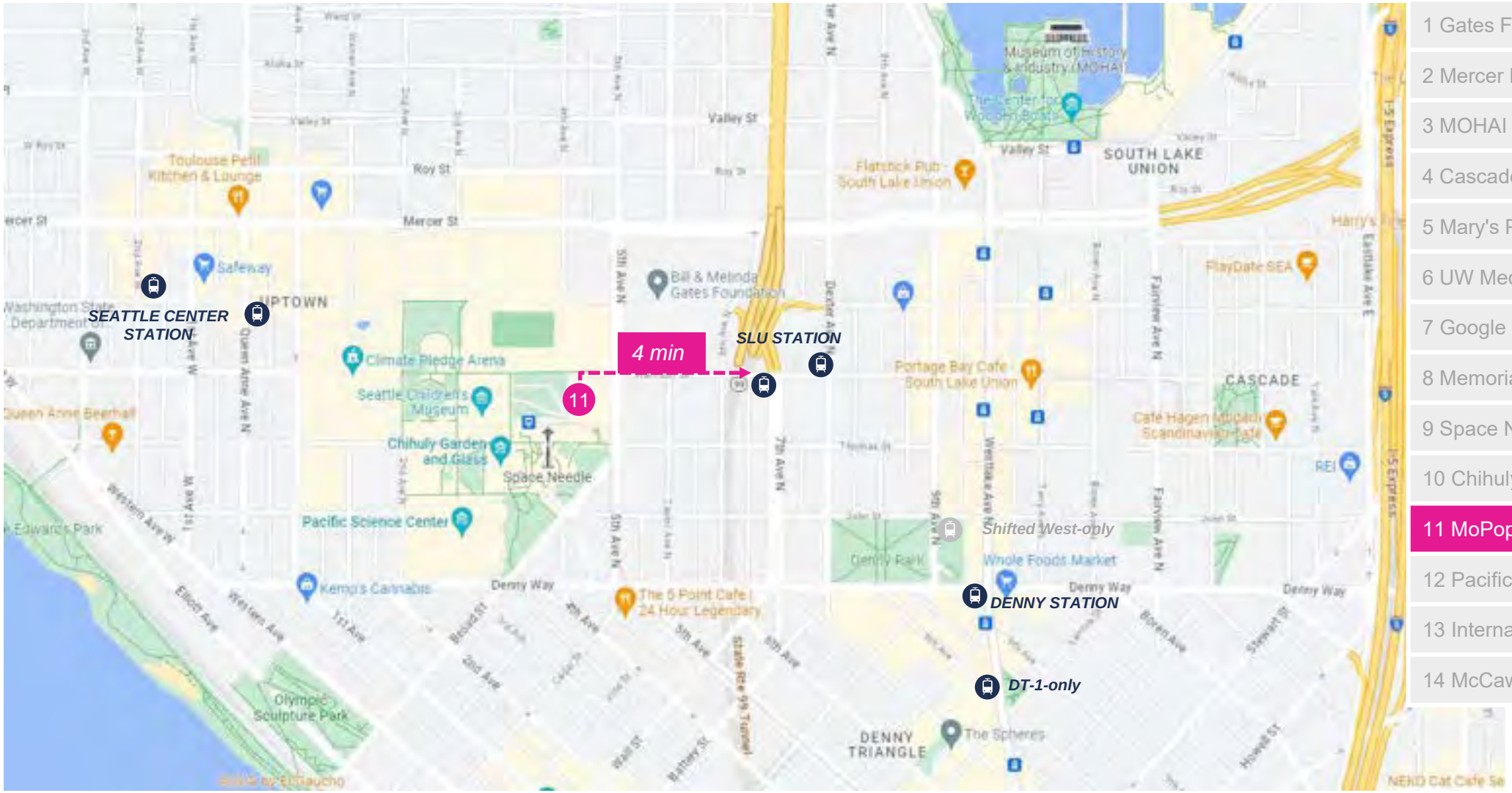

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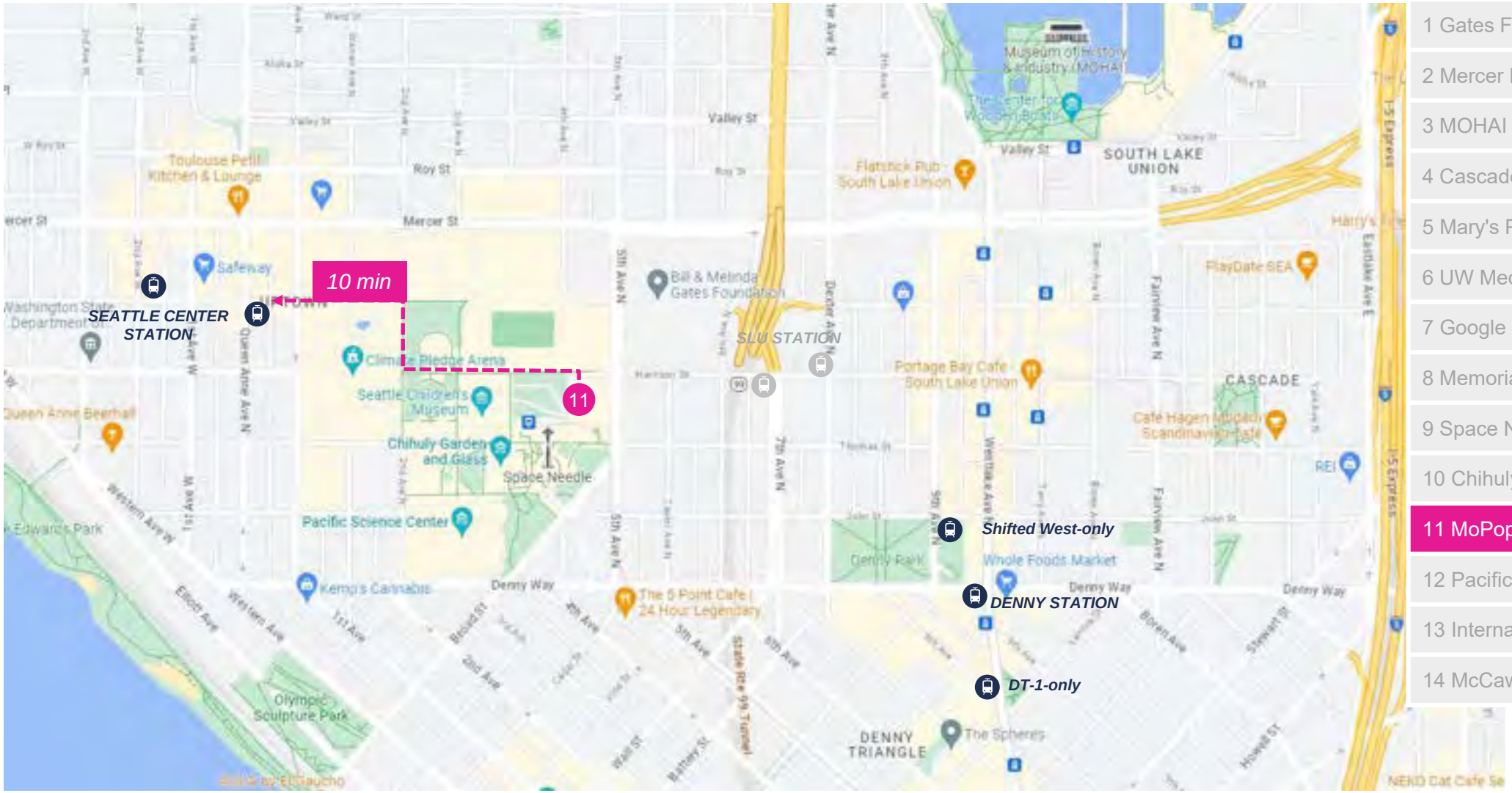

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Equity

Racial Equity Toolkit

Outcomes

- Advance environmental and economic justice to improve economic and health outcomes for communities of color.
- Enhance mobility and access for communities of color and low-income populations;
- Create opportunities for equitable development that include expanding housing and community assets for communities of color;
- Avoid disproportionate impacts on communities of color and low-income populations;
- Create a sense of belonging for communities of color at all stations, making spaces where everyone sees themselves as belonging, feeling safe, and welcome; and
- Meaningfully involve communities of color and low-income populations in the project.

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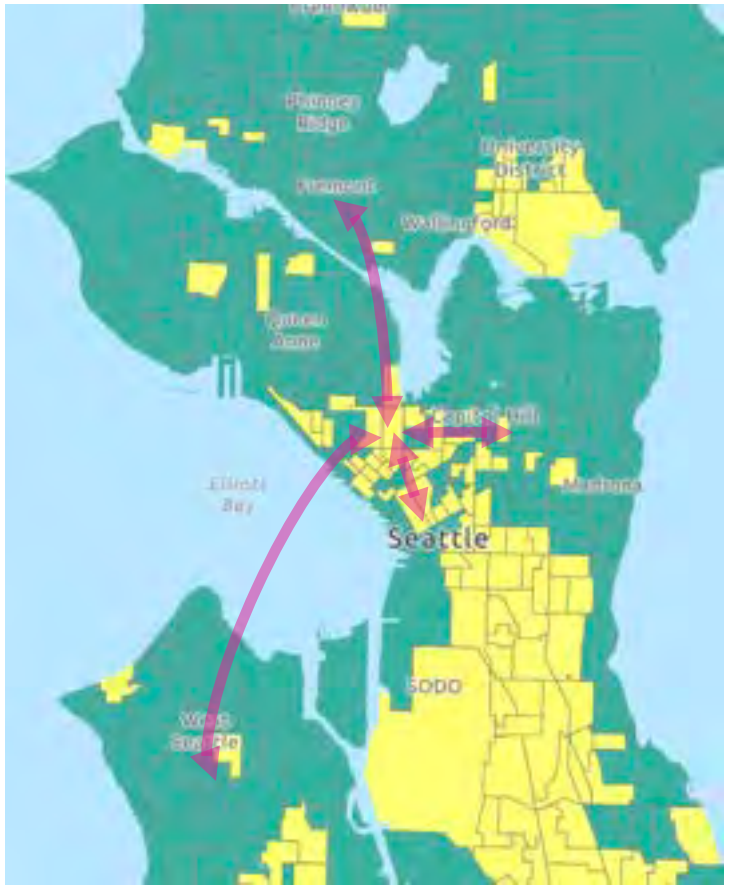
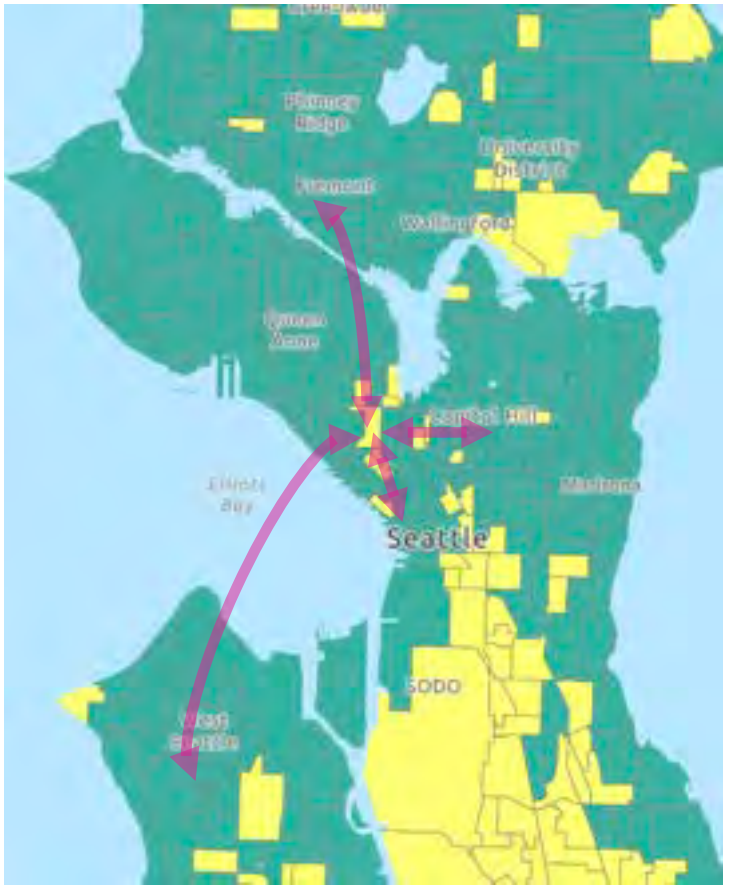
Equity

Low-Income



Communities of Color



Limited English Proficiency

At or Above Regional Average

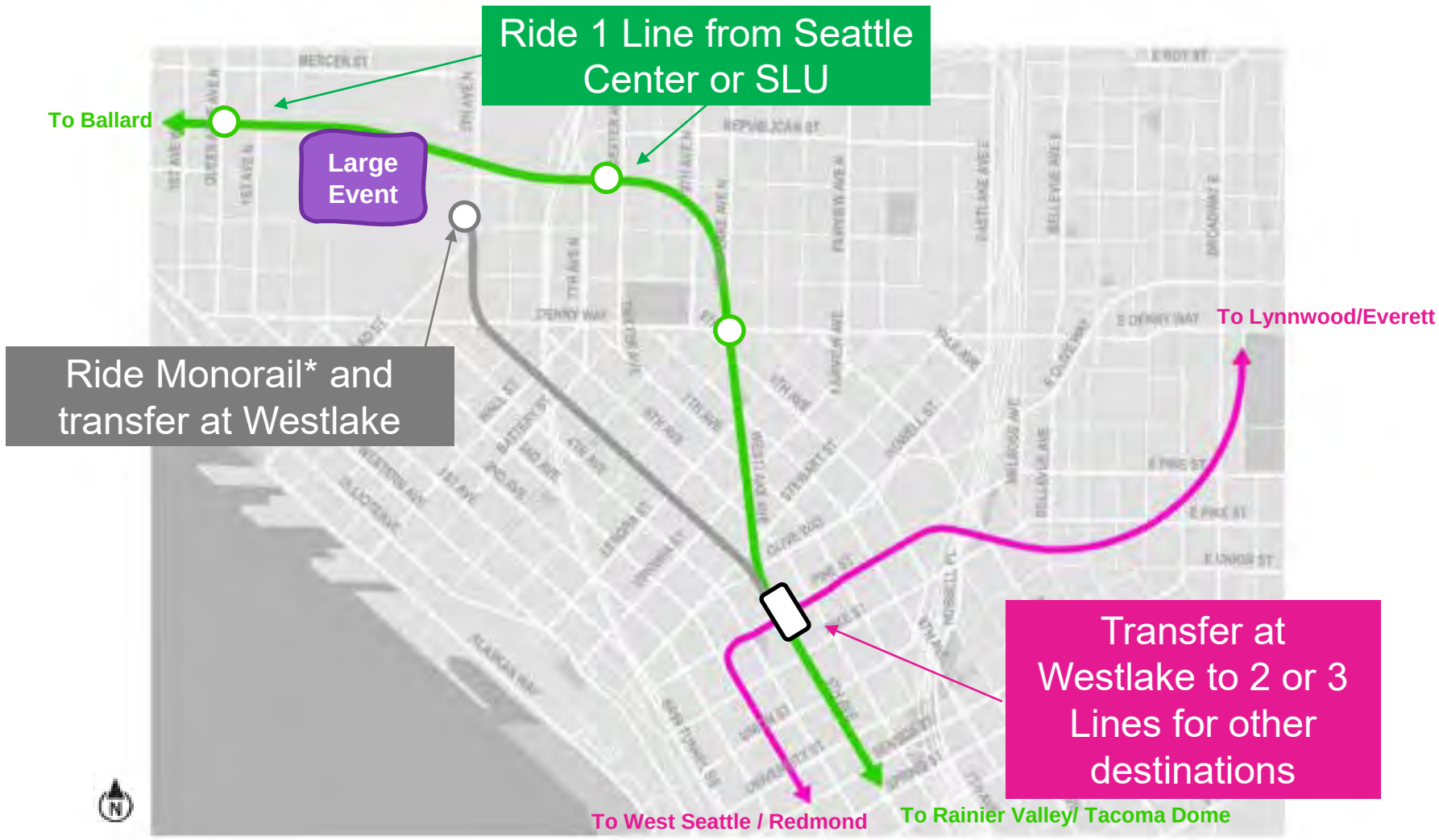
Below Regional Average

SoundTransit

Seattle Center access/capacity

Seattle Center/ Large Events

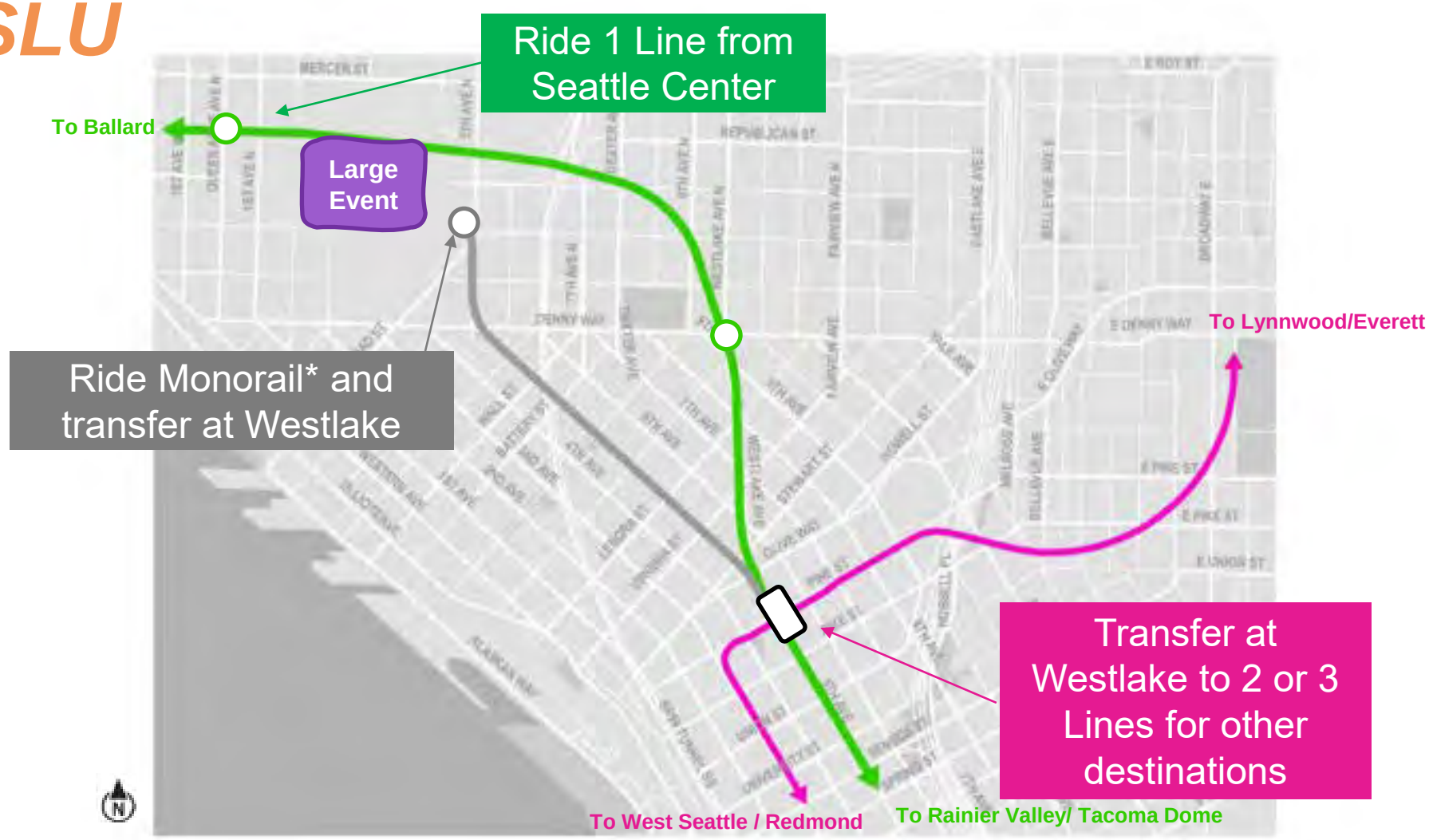
With SLU


Ride 1 Line from Seattle Center or SLU
To Ballard
Large Event
Ride Monorail* and transfer at Westlake
To Lynnwood/Everett
Transfer at Westlake to 2 or 3 Lines for other destinations
To West Seattle / Redmond
To Rainier Valley/ Tacoma Dome

*At the time of station opening the monorail will be an 80-year-old system that would likely require major investment to upgrade the system

Seattle Center/ Large Events

Without SLU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*At the time of station opening the monorail will be an 80-year-old system that would likely require major investment to upgrade the system

Three event scenarios:

Climate Pledge Arena

18,300

Memorial Stadium

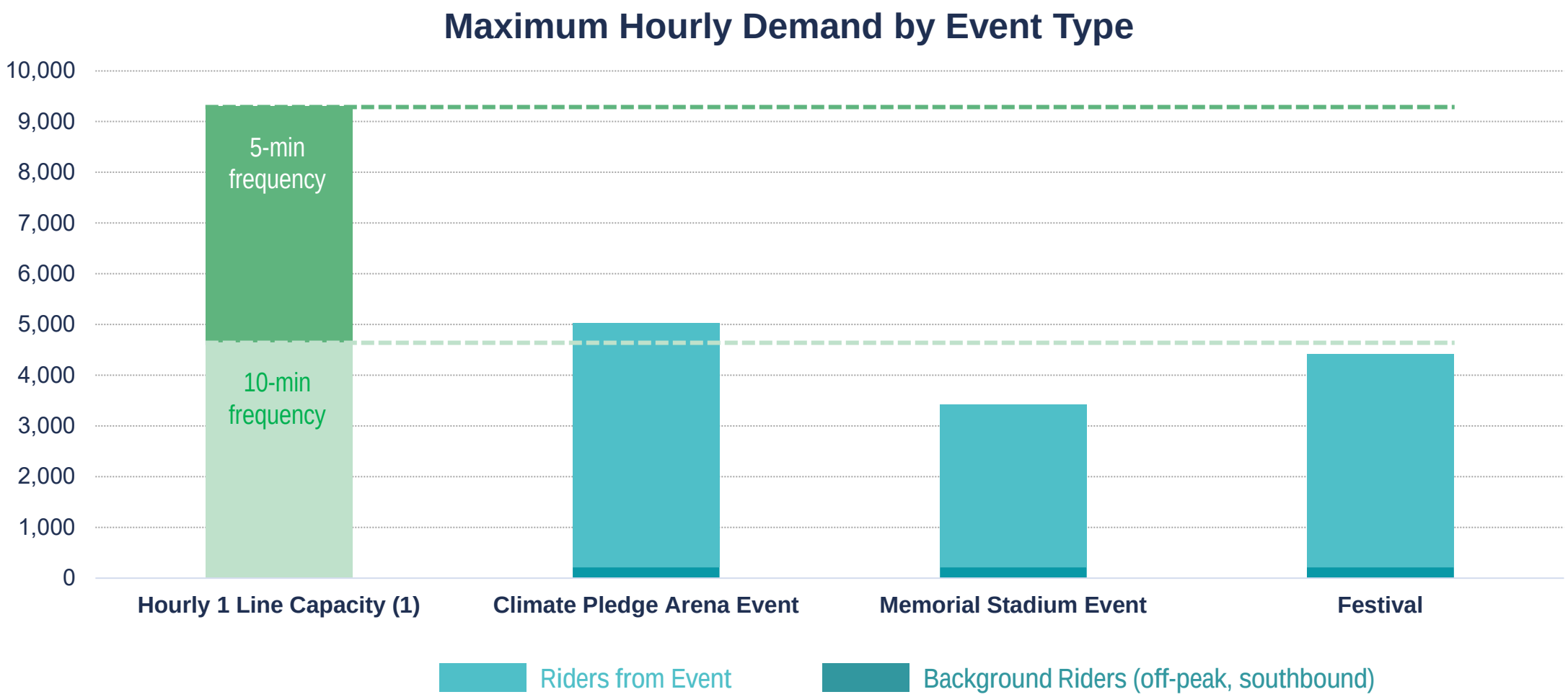
12,000

Large Festival

100,000 (per day)

SoundTransit

Passenger Surge (Post Event)

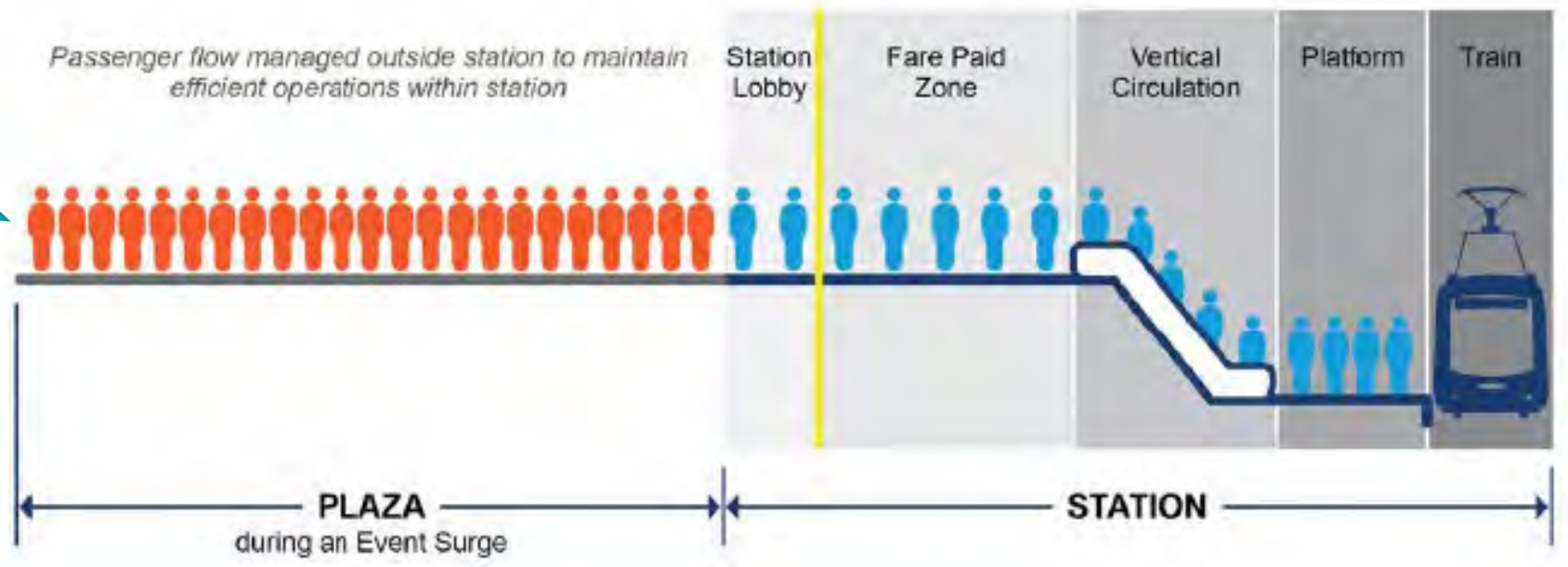


[1] *Capacity for single direction of travel*

Passenger Surge (Post Event)

If the anticipated passenger surge volume exceeds the capacity of the Link light rail system, Sound Transit will plan and deploy passenger flow management strategies at stations.[1]

Metering occurs at venue, pathway to station, and at station entrance (if needed)



**For frequency of events at Seattle Center, passenger flow management would need to be in place through agreement with City, Climate Pledge, and other partners*

[1] Reference: Station Experience Design Guidelines (June 2022) Section 2.3.4C.i

Lower performing — Higher performing

	Denny Westlake	Denny Terry	Denny Westlake refinement options	
	Draft EIS (DT-1)	**SLU Mix-Match**	**Shifted North**	**Shifted West**
Technical *street closures*	Westlake Ave fully closed to cars, buses and streetcar for 4 years during construction	Westlake Ave open to cars, buses and streetcar during construction	Westlake Ave temporarily decked during construction. Open to cars and buses but not streetcar. Reduced number of lanes for 3-4 years.	Westlake Ave substantially open to cars, buses and streetcar during construction; avoids closure of Harrison St
utilities	Sewer and electrical utilities on Westlake Ave; fiber crossing at Lenora St; major electrical utilities on Harrison St	Major relocation of fiber from Terry Ave onto adjacent streets (Boren, Denny); more extensive electrical utilities on Harrison St	Less extensive sewer and electrical utility work on Westlake Ave; avoids fiber crossing at Lenora St; major electrical utilities on Harrison St	Substantially avoids utilities on Westlake Ave and completely avoids major electrical utilities on Harrison St
constructability	Base case for constructability comparison	Extensive ground improvement/mined cavern on Harrison St (east of Dexter)	Phased in-street construction to maintain traffic adds construction complexity and extends duration of street effects (8 years vs 4 years)	Potentially shorter station construction duration due to improved site access and mostly off-street construction
Performance *ridership, transit integration, passenger experience*	Convenient transfer to transit on Westlake Ave	Minimal impact to ridership; short walk to transit lines on Westlake Ave; provides station access to both sides of Denny Way	Convenient transfer to transit on Westlake Ave	8,000 (5%) fewer weekday trips on Ballard Link Extension. Potential to re-route some bus lines to serve station location. Increased walk time to some destinations.
Cost *compared to Denny Westlake Draft EIS DT-1*	Base case for cost comparison	$340m additional cost	$170m additional cost*	$440m cost savings due to consolidation of Denny and Harrison St stations*
Schedule *overall project delay*	Base case for schedule comparison	Uncertainty of fiber relocation could delay overall schedule	No delay to overall schedule	No delay to overall schedule
Risk *substantial cost, schedule, or feasibility risks*	Base case for risk comparison	Substantial disruption and litigation risk if inadvertently cut fiber lines	Potential property development risk	Potential property development risk; avoids major electrical utilities on Harrison St

Results comparison

All costs are rounded in $2019. Comparative estimates based on limited design to inform comparison of concepts.
* Assumes full acquisition of Block 48 property (~$200m)

Community feedback

Community feedback

- Broad interest in retaining both Denny and SLU stations to serve the density and activity of surrounding neighborhoods, including SLU, Belltown and Uptown.
- Concerns about reduced walk, bike and bus access and loss of light rail ridership associated with a consolidated station and potential for crowding at adjacent Seattle Center and Denny stations.
- Broad concerns about impacts to Westlake Avenue and interest in potential ideas to mitigate or limit full closure of Westlake Avenue and related effects to traffic, transit and businesses in the area.

Community feedback

- Interest in Shifted West alternative to avoid construction impacts on Westlake Avenue and related effects to the neighborhood, downtown recovery and to public and private investment in SLU.
- Some interest in whether a shifted west SLU station could be paired with a Shifted West Denny station to maintain two stations and avoid construction effects and utilities at SLU Harrison station location.
- Others concerned about a shifted west SLU station location because of potential for impacts in the vicinity.

Community feedback

- Strong interest in delivering on the voter approved plan and avoiding any further delay or additional cost associated with further studies of new concepts.
- Some interest in any opportunities to speed up delivery of the Ballard Link Extension project.
- Questions about opportunities for TOD, potential for additional funding, and about potential property effects and other construction effects.

Potential board action

Potential board action

Motion No. M2023-57

A motion of the Board of the Central Puget Sound Regional Transit Authority confirming or modifying the preferred station location for the Denny Station for the Ballard Link Extension Environmental Impact Statement

wsblink.participate.online

SOUNDTRANSIT

Puget Sound Sage
414 S Maynard Ave S
Seattle WA, 98104

(206) 568-5000
pugetsoundsage.org

9 December 2024

Lauren Swift - Ballard Link Extension
Sound Transit Board Members
Goran Sparrman, Sound Transit CEO
401 S. Jackson St.,
Seattle, WA 98104

RE: Scoping for Ballard Light Rail Extension DEIS and CID station location

Dear M. Swift and Sound Transit Board Members,

In 2023, community leaders and organizations from Seattle's Chinatown International District (CID) came together to oppose a Ballard Link Extension station (BLE) in the heart of their neighborhood. This included the Fifth Ave Deep, Fifth Ave Shallow, and Fifth Avenue Diagonal alternatives. As a result, the Sound Transit Board (through Motion No. M2023-18) designated a new option – two stations just north and south of the CID – as the preferred alternative. The Board also requested additional investigation of a new Fourth Ave "shallower" station in response to concerns raised by some that the North and South stations were not co-located with the existing CID transit hub.

We were subsequently very surprised to see the Fifth Avenue diagonal included in a recent report to the Sound Transit Board, as if that alternative was now being considered along with the other two. For the purpose of this letter, and the BLS DEIS scoping in general, it is unclear what alternatives are now being studied in the upcoming EIS. No outreach or advanced notice to the CID community was given. This failure on the part of Sound Transit is consistent with the inadequate community engagement in the lead up to the larger WSBLE DEIS in 2022 and 2023.

Furthermore, based on M2023-18 and the Board's discussion of alternatives at the time, Fourth Avenue shallower no longer meets their criteria for station location and should not be further considered. Sound Transit's purpose in M2023-18 was to study how the high cost and disruption to the CID community could be reduced for the Fourth Ave Shallower alternative. In *Additional Study Results: Construction Approach and Duration for CID Alternatives*, Sound Transit staff and experts determined that reduction of both cost and harm is not possible with a Fourth Avenue option and therefore would not be considered further.

For the following comments on BLE scoping, we will assume that all three alternatives (Fourth Ave Shallower, Fifth Ave diagonal, and the South station) are being seriously considered. We also expect the following from the NEPA DEIS analysis:

- The three station options mentioned in the *Additional Study Results* will be compared so the public and Sound Transit Board can clearly identify the costs and benefit tradeoffs of these station alternatives to the CID community and neighborhood.
- Additional and deeper study of the impacts for both construction and operational periods.
- Deeper analysis of environmental justice impacts to the CID neighborhood, especially cumulative impacts.

Concentration of Impacts in the CID

The CID is a highly concentrated, highly integrated and dense neighborhood. For its size, the neighborhood provides more social cohesion and cultural access than any other in Seattle. Although small, the neighborhood provides larger than expected social and economic benefit to members, visitors, and the region. For this reason, impact analyses to the neighborhood must be fine-tuned and specific. As was revealed by strong community opposition to station sites in the middle of the CID, construction impacts are especially important to the community.

To that end, we believe the 2023 DEIS provided an inadequate level of detail and specifics to understand construction impacts. Given the high amount of commercial, industrial, tourist, customer, resident, and unhoused people's use of streets in a concentrated neighborhood, Sound Transit must gain a better understanding of local dynamics - a small change in one part of the neighborhood could greatly affect another. For example, a statement in the WSBLE DEIS that a six-year (or more) construction period will be merely an inconvenience misses the interdependence of both stakeholders and the CID's sub areas. For example, under a Fifth Ave Diagonal station, closure of King Street and presence of large-scale construction across the street from the CID's most important park will have major ripple effect not captured in the prior DEIS.

As another example, the WSBLE EIS stated that "Hing Hay Park would experience proximity impacts due to construction staging across the street on the west side of 6th Avenue South. Impacts would include a temporary increase in construction traffic, dust, noise, and would also be visible to park users." This is not an analysis of levels of particulate matter caused by construction nor levels of construction noise, but a vague statement that anyone could come up with – it also lacks a cumulative analysis. We expect Sound Transit to provide measurements and more detailed comparisons when it comes to historically impacted communities.

Transportation Impacts

<u>Current Travel Modes</u>
The BLE EIS must study the current modes of travel for the CID's myriad users.

During the debate on a CID station location, many people outside of the neighborhood complained that a South station would make the new light rail line too inaccessible. Several residents said that they would not be able to travel to a South station from their apartment. However, no analysis was provided by Sound Transit on who uses light rail now and who will use it in the future. A Sage-conducted survey of 70 CID residents and workers – most of whom were older than 60 – showed that few people rely on

light rail to travel. By far the highest modes were walking and Metro bus. This mode split is likely a reflection of both the frequent destinations of residents as well as cultural familiarity with bus travel.

Furthermore, the high ridership figures for a future CID station, by Sound Transit's own estimates, does not reflect people coming to the CID or Pioneer Square neighborhoods, but transferring within the light rail system or to other travel modes. Sound Transit should provide clarity on whether or not the CID will benefit from the high ridership or simply be a transfer point. We need a comparison of the station options and their benefit to the community, based on a projection of actual visitors disembarking in the CID. This will illuminate the tradeoff between impacts to the CID versus benefits for the rest of the region – a tradeoff the CID and its BIPOC community have been forced to endure for decades.

Pedestrian Impacts

Sound Transit must provide an analysis of pedestrian activity in the CID. During construction, the 5th Ave Diagonal and the 4th Ave Shallower locations will be very disruptive to key pedestrian corridors and access to the CID. In the WSBLE DEIS, Sound Transit claims that rerouting pedestrian traffic around construction hazards will create an "inconvenience" for people using the sidewalks. The problem with this conclusion is that the CID is already hazardous for pedestrians, despite its high walkability. Streetcar rails, deteriorated sidewalks, cars short-cutting through the neighborhood, massive car influx during sports events, delivery drivers to the dozens of restaurants, and delivery trucks to the many businesses create a maze of hazards that pedestrians must navigate. We need to know which of the station locations will exacerbate this cumulative impact the most and least. Sound Transit can collect data on pedestrian traffic volume on different streets and roads (just like is done for intersections) especially for those being closed or partially closed.

On the flip side, the community needs to know how many large trucks and construction vehicles will be on the streets during the different phases. For example, the 5th Ave and South stations will require an enormous removal of soil – how many dump trucks will be driving through the neighborhood and on what streets? Again, the CID is not a typical neighborhood. We have a disproportionate number of elderly, unhoused, low-income and BIPOC residents that have different travel patterns and needs than in other Seattle neighborhoods. The community does not want to experience death or injury from the conflict between construction vehicles and local mobility.

Gateway to CID

The Chinatown gate monument that welcomes visitors to the neighborhood is more than symbolic – most people exiting the Union Station transit hub walk east on King Street to the center of the historic part of the CID. Closing off King Street for a Fifth Ave Diagonal station for a proposed 3 years (minimum) could be harmful to far more businesses than just the ones being displaced by building demolition. The BLE DEIS's analysis of pedestrian activity assumes walkers will just go around (although Weller may be closed as well) the block. However, fewer people may visit the CID as a result, having an undirect impact on other businesses, social service providers, and cultural attractions.

Cumulative Impacts

The BLE DEIS mentions the impact of multiple development projects occurring at the same time as a source of disruption and displacement. But the DEIS lacks the details needed to compare station locations.

For example, several large buildings have recently been developed or are being developed now in the CID. Given the tight quarters and scale, project construction is slow and requires long lasting sidewalk closures. The BLE DEIS should include potential development projects through the end of construction to determine cumulative impacts.

More specifically, the Fifth Ave Diagonal and South Station locations offer significant TOD potential. Construction of new, affordable and community-oriented projects will be key to the success of the new station. However, this will add to cumulative impacts – even though construction may end after 6-7 years, how many more years of building construction also close sidewalks and create hazards? Given how long in-fill development takes, the station area could experience 10-15 years of construction.

Bus Cuts

After the opening of the Link Light Rail Line to SeaTac Airport, King County Metro cut several bus lines and reduced frequency of others, concluding that they are redundant with the new light rail line. However, the light rail stops every mile or so, while the cut buses (such as the 42) stop every few blocks, serving children, elderly people, and other mobility-limited users. Instead of an enhancement, the riders on these buses experienced a loss in service, either experiencing longer trips or shifting to a different mode altogether.

The DEIS needs to show whether transit dependent CID residents will lose more local service than gained from a light rail station. Will Metro cut buses from West Seattle? Or buses coming from South Seattle to circulate downtown? Community members need to understand these implications before being able to weigh in on alignment and station locations.

Congestion

An analysis of intersection Level of Service should be done for the South Station alternative for comparison with the other two, which were included in the WSBLE DEIS.

Environmental Impacts

Noise and Vibration

The CID experiences a disproportionate level of noise and vibration, compared to many other residential neighborhoods in Seattle. Many residents and people on the street are already impacted by I-5, the Streetcar, heavy traffic on arterials (Jackson St, Dearborn St, and 12th Ave), as well as congested streets within the neighborhoods. Continuous building construction adds yet more noise. Moreover, a large portion of affordable housing in the neighborhood lacks air conditioning, and closing their windows in the summer is not a safe option.

The WSBLE states that "Distribution of [noise] impacts to minority and low-income populations would be similar to the distribution to the general public" (page 5-55) and that "No monitoring was done in the SODO, Chinatown-International District, or Downtown segments because the project would be in a tunnel or in areas without noise-sensitive receivers" (4.3.7-4). The DEIS further states that dBA could be as high as 89 at 50 feet for cut and cover construction, which could be painful for a large number of people around a construction site. Because of this, we believe Sound Transit has not adequately assessed the noise impacts during construction.

Sound Transit should measure current noise volumes in the areas near the proposed station location alternatives, so an adequate cumulative impact can be calculated. Sound Transit should also consider Hay Hing Park as a sensitive receiver – cultural events and outdoor concerts occur there all the time.

Air Quality

The CID has some of the poorest air quality in the city. Airborne particulate matter from I-5, the Port of Seattle's maritime operations, commercial truck traffic and some fossil fuel powered buses blanket the community with pollution. The community also experiences disproportionate respiratory illness. While a new transit line will reduce pollution for the region, the question for Sound Transit is whether the construction of the new station will create a harmful cumulative impact, especially on residents and workers who live nearby the proposed station alternatives.

As with noise impacts, Sound Transit has not measured actual particulate matter levels are in the neighborhood. Furthermore, the WSBLE DEIS states that "According to Code of Federal Regulations Title 40, Section 93.123(c)(5), because the duration of major construction activities for the project would not exceed 5 years in any one location, construction emissions are considered a temporary impact and a project-level conformity analysis is not required" (page 4.3.6-7). As we state above, construction involving large vehicles and equipment may last six years or more on the station alternatives, and even longer with construction of TOD near the stations. Sound Transit should provide air quality data on both diesel and dust particulates already present and projected during construction for each station area.

Business Displacement

Small businesses are the life blood of the CID's local economy. Several factors allow restaurants and shops to succeed – older buildings that are more affordable, proximity to multiple high-capacity transit lines, many local and regional visitors of Asian heritage to specialty shops, proximity to sports facilities, and cultural assets that attract tourists and visitors. But small businesses in the CID are also fragile, consisting of many small mom-and-pop that operate at thin margins and are very sensitive to changes in the above factors. Sound Transit further states, "These displacements include businesses that are important to the community because of the history, strong cohesion, and long-standing community connections in the neighborhood."

While the WSBLE DEIS identifies exactly which buildings will be torn down and the number of businesses displaced for station location alternatives, it fails to consider the broader impact of station construction on the rest of the CID. For example, closure of King Street and Weller Street could create enough diversion away from the area around Hing Hay park that other businesses east of 6th Ave will suffer as well. The potentially displaced businesses on 5th and King Street, under the 5th Ave Diagonal option, may not be able to succeed in any other location, relying heavily on being across the street from Union station.

Sound Transit should study the number of commercial spaces available for small businesses, the importance of proximity to foot traffic, and whether or not displaced businesses could successfully relocate. In addition, subsequent construction of mixed-use buildings should not be considered replacement space, as rents for new construction are far higher than in older buildings. As the CID could suffer a permanent loss of key affordable business space with the demolition considered for 5th Ave Diagonal, Sound Transit should also compare the locations to determine the least harm.

Historic Preservation

The WSBLE DEIS states that no station options in the CID can avoid demolition of a potentially historic building. However, the CID South station was not considered. Because the Federal Transit Administration requires a determination of least harm, and the South station does not result in demolition of a historic building, the new DEIS must compare all three alternatives.

Transit Oriented Development

We believe that equitable TOD that creates affordable housing, affordable commercial space, cultural spaces, new recreation space, and cultural preservation is the most important, long-lasting benefit of a new station. It will be an opportunity to grow the neighborhood in ways that include, not displace, existing community members.

To that end, Sound Transit should study the actual TOD potential in detail, not in the vague way described in the WSBLE DEIS. To compare station location alternatives, we should know:

- Total area of land available for TOD after station construction.
- Total number of affordable units that could be built, with a baseline of Sound Transit's TOD policy, but also beyond.
- Specific opportunities for joint development with CID-based developers.
- Potential for a new park or recreational open space, which the neighborhood currently lacks.

Closing Notes

The CID has always been a welcoming space for strangers and working-class people, as well as a hub of commercial activity for Seattle. Public transit has been key to the longevity of the community and is today used widely by the CID's BIPOC residents and workers. Despite perennial construction in and around the CID, public transit is one of the clear benefits to the community, in contrast with I-5. However, the proposed WSBLE system may only marginally improve transit access to CID stakeholders. We don't want to see, once again, an infrastructure that is a benefit to the region (and State) but causes disproportional harm to the CID – with little upside. We believe that if Sound Transit can study and answer the questions we pose in this letter, everyone will be better informed about these tradeoffs, and which station location ensures maximum benefit to our special community. Please reach out to us with any questions you have about our comment letter at howard@pugetsoundsage or jm@pugetsoundsage. Thank you for your time and attention.

Sincerely,

JM Wong, Organizing Director
Howard Greenwich, Research Director

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Seattle, WA 98104
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office 206.587.0700
fax 206.587.2308

December 9, 2024

VIA E-MAIL

Lauren Swift
Central Corridor Environmental Manager
Sound Transit
401 South Jackson Street
Seattle, WA 98104
lauren.swift@soundtransit.org
blescoping@soundtransit.org

Re: Scoping of Ballard Link Extension DEIS ("BLE DEIS")

Dear Ms. Swift:

We represent the Seattle Center Foundation and the following resident organizations at Seattle Center: KEXP, Seattle Repertory Theatre, The Vera Project, Cornish College of the Arts, Classical KING FM 98.1, MoPOP, Seattle Children's Theater, PNW Ballet, and Seattle Opera (collectively the "Clients"). We commented previously on behalf of the Clients regarding the West Seattle Ballard Link Extension Draft Environmental Impact Statement ("WSBLE DEIS"). A copy of that letter is attached as Attachment A for background and context for the comments this letter contains regarding the scoping of the BLE DEIS. Our Clients are ardent supporters of the Ballard Link Extension ("BLE") as this transit facility will ultimately make it easier for people throughout the region to visit Seattle Center and partake of the offerings this cultural mecca provides. However, the construction of the BLE will create many impacts that must be analyzed both individually and cumulatively. Building six light rail stations and two tunnels simultaneously will create many related and interlinked impacts with potentially huge unintended consequences for the Clients.

TRANSPORTATION

This element of the environment is perhaps the most complicated one to assess the extent of the impacts due to the unpredictability of the decisions motorists will make as they confront closed streets and intersections. Sound Transit must do more analysis of the transportation impacts than it did in the WSBLE DEIS. Construction laydown sites must be identified and construction traffic routes must be identified to assess the transportation impacts. Sound Transit seems fairly committed to using design build contracts for the light rail stations which means postponing important means and methods decisions until contractors are hired. However, the potential magnitude of the impacts of the BLE necessitate earlier decisions regarding construction lay-down sites, construction routes, and closures of roads and intersections. Meaningful analysis of the construction impacts cannot otherwise occur. Additionally, there must be cumulative analysis that accounts for disrupted traffic taking routes that might not normally be considered due to the simultaneous construction of other light rail stations. For the Seattle Center and its resident organizations, the analysis needs to include impacts for both event times and nonevent times.

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Parking is another critical issue for the Clients. Even with no closed streets or intersections, parking is a scarce resource when there are large or multiple events happening at Seattle Center. Construction of the Seattle Center Station will result in loss of street parking for periods of time and existing surface parking lots may be lost to lay-down and construction staging areas. The loss of parking that occurs due to the construction activities for the Seattle Center Station and potential mitigation options should be analyzed. Construction worker parking should also be considered and mitigation such as bussing the workers to the construction site(s) should be considered.

One aspect of the Seattle Center Station that will create very large transportation impacts is the very large trench that will be dug in the Republican Street right-of-way from the station to the north tunnel portal. This will close a number of intersections and severely complicate north-south travel in the Uptown/Seattle Center neighborhood. Mitigation for these impacts, such as bridging the trench with steel plates, must be incorporated into the construction plans, and the bridging must occur at all the impacted intersections.

Another transportation impact that the Uptown/Seattle Center neighborhood will incur is the export of most of the dirt from excavating the tunnel. This will necessitate hundreds of dump truck loads going from the Seattle Center Station location to I-5 or other highways. The haul route(s) for these trips must be analyzed and the timing of the trips must be managed to avoid significant adverse transportation impacts.

The BLE DEIS must also account for the concurrent development of significant transportation infrastructure contemplated by Proposition 1 which the voters of Seattle approved in November. The Revive I-5 project proposed by the Washington Department of Transportation may also present concurrent transportation impacts depending on the timing of Sound Transit's construction work. These concurrent projects and their cumulative impacts must be analyzed and mitigated.

NOISE AND VIBRATION

The Clients appreciate and thank the Sound Transit Board for moving the preferred location of the Seattle Center Station further west on Republican Street. That decision eliminated many potential construction impacts to Seattle Center and its resident organizations. However, the route from the South Lake Union Station to the new Seattle Center Station location further west on Republican Street will still traverse beneath the Seattle Center Campus. Our Clients all have buildings and performances that will be subject to potential noise and vibration impacts both during and after construction. Those potential impacts are serious and must be analyzed. Some of those impacts may be unavoidable, but they must be analyzed and mitigation measures must be evaluated. Potential mitigation measures include scheduling construction activities to avoid times when performances are occurring; utilizing vibration absorbing mats beneath the tracks; and using vehicles with rubber wheels for construction and to move materials and equipment into and out of the tunnels.

UTILITIES

The BLE will require extensive relocation of utilities. The BLE DEIS must analyze the timing of those relocations and the potential cumulative effects of those relocations. There are not only utility service concerns but also transportation impacts that will result from this work. Roads, bike lanes, and sidewalks will all be impacted by the relocation work. Impacts and mitigations must be analyzed.

ECONOMIC IMPACTS

Although the State Environmental Policy Act regulations so not require rigorous economic analysis, where the proposed action may result in blight, economic impact analysis must occur during environmental review. The pandemic demonstrated that blight can occur even in a vibrant city such as Seattle. Rows of closed shops and stores appeared in Downtown Seattle during the pandemic as a result of the owners having to close because they had no customers. Seattle has still not recovered from that blight. The same thing can happen in the Uptown/Seattle Center neighborhood if closed streets and intersections make it difficult or impossible for pedestrians and motorists to access stores and shops. The owners of those businesses may have no choice but to close, especially given the seven to ten year period of construction.

SUMMARY

The BLE will be perhaps the most disruptive construction project for the City of Seattle since I-5 was constructed through the City in the sixties. With the Proposition 1 projects being constructed concurrently, it is imperative that Sound Transit, and the City, plan carefully in a coordinated manner to minimize the impacts of these projects. Lack of analysis of the specific and cumulative impacts will likely create unintended consequences that become existential threats for the cultural organizations at Seattle Center as well as the many small businesses in the Uptown/Seattle Center neighborhood. Thank you for your consideration of our suggestions for the scope of the BLE DEIS.

Sincerely,

Donald E. Marcy

cc: Jane Zalutsky, Executive Director Seattle Center Foundation
Brenda Barnes, CEO Classical KING FM 98.1
Pinky Estell, Director of Operations Cornish College of the Arts
Jeffrey Herrmann, Managing Director Seattle Repertory Theater
Kevin Malgesini, Managing Director Seattle Children's Theater
Ethan Raup, CEO KEXP
James Robinson, General Director Seattle Opera
Ellen Walker, Executive Director Pacific Northwest Ballet
Jason Clackley, Artistic Director The Vera Project
Michele Smith, CEO MoPOP
Tom Mara, Executive Director Seattle International Film Festival
Marshall Foster, Seattle Center Director

Attachment A

SCF-Resident Orgs DEIS Comment Letter
April 27, 2022

ATTACHMENT A

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April 27, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 South Jackson Street
Seattle, Washington 98104

Re: West Seattle Ballard Link Extension Draft Environmental Impact Statement ("DEIS")

Dear Ms. Swift:

We represent the Seattle Center Foundation and the following resident organizations at Seattle Center: KEXP, Seattle Repertory Theatre, The Vera Project, Cornish College of the Arts, Classical KING FM 98.1, MoPOP, Seattle Children's Theater, PNW Ballet, and Seattle Opera (collectively the "Clients"). Our concerns and comments are focused on the Downtown Segment and the Seattle Center Station in particular. The preferred alternative creates many significant adverse environmental impacts to our Clients, particularly KEXP and The Vera Project which, along with the Seattle International Film Festival, are located in the Northwest Rooms ("NW Rooms" and KEXP, The Vera Project, and Seattle International film Festival ("SIFF") are referred to collectively the "NWR Occupants") and the Seattle Repertory Theatre ("Seattle Rep") and Cornish College of the Arts ("Cornish") which are also adjacent to the proposed Seattle Center Station for the Preferred alternative. All of the Clients are tenants of the City of Seattle ("City").

We and the Clients have reviewed the DEIS which was issued recently by Sound Transit as lead agency under the State Environmental Policy Act ("SEPA") and the United States Department of Transportation Federal Transit Administration as lead agency under the National Environmental Policy Act ("NEPA"). Although the DEIS recognizes there will be some significant impacts to the Clients, the document does not recognize all of the significant impacts nor does it capture accurately the full effect the Seattle Center Station in the preferred location (the "Project") will have on the Clients. It appears that the construction impacts will be so severe that the NWR Occupants, Seattle Rep, and Cornish will be unable to operate in the ordinary course of business for a significant period of time. While we recognize and appreciate that Sound Transit has been working with the Clients on refinements to the Seattle Center Station, we do not address those refinements in this letter as they are not in the DEIS and have not been evaluated other than to establish that they might be feasible for Sound Transit to construct.

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Initially, it may be helpful to provide you with some context regarding the Clients and their operations in the at Seattle Center:

KEXP

Besides its radio broadcasts, KEXP hosts live music and related events on site each year. 2017 was the last complete year of programming before embarking on arena mitigation construction work in late 2018. That year, there were 377 such events including 136 live music sessions that were free and open to the public. Among the many other music related events open to the public were the KEXP Record Fair, the Songbook author reading series, Mastering the Hustle workshops for artists, City of Music Career Day, monthly "Flights and Rights" partnership with ACLU, as well as civic related events such as a Mayoral Forum on Arts and the Environment, a naturalization ceremony in partnership with ARTvocacy, an ArtsFund event "Setting the Table for More Diverse Nonprofit Boards," and more. These live sessions and events are the engine that drives many critical aspects of KEXP's mission and business, including donations and business support. Virtually all live performances are recorded for future use by KEXP, including on YouTube, which serves KEXP's largest audience with 2.7 million subscribers and over 1 billion views. The performances are also broadcast on KEXP's 24-hour FM signal, broadcast stream and 14-day archive, all of which are available to the public at no cost. The in-person traffic created by the live sessions and events not only builds momentum for KEXP, but also sustains the Caffe Vita coffee shop and Light in the Attic Record Shop, KEXP's subtenants located in the Gathering Space. If KEXP is required, on account of the Project impacts, to move or curtail these public events, then all three entities will suffer.

Seattle Children's Theater

Seattle Children's Theatre (SCT) offers theatre programs that center on children and youth, with great attention to the people in their lives – their families, their teachers, and their communities. Since 1975, SCT has produced 274 plays, including 117 world premiere productions, with many of these works going on to other stages. In 2019-20, Theatre for Young Audiences/USA ranked SCT #1 in the country as an influencer in developing TYA titles. SCT has served nearly six million people through our Mainstage, Drama School, and school access programs. These programs create a dynamic entry point to the arts for many children in the region, inspiring their imaginations, empowering their creativity, and instilling an appreciation for a diversity of stories and people. Providing access for ALL young people is of primary importance to SCT. We strive to be inclusive, diverse, and equitable, and to remove any and all barriers to children's access. A school field trip to SCT is often the very first live arts experience for many of our young people. We hold proud the role we play in opening a world of imagination and possibility to the youth of our region.

Seattle Opera

Since 1963, Seattle Opera is committed to serving the people of the Pacific Northwest through music, storytelling, and programs for people of all ages, income levels and demographics. Annually, more than 80,000 attend the company's performances and another 150,000 are served through school performances, radio broadcasts, and more. We bring opera to life in many ways, offering artistic

excellence through national and international collaborations. Seattle Opera strives to create an environment where artists, staff, behind-the-scenes workers, and members of the community feel a strong connection to the company and to the art of opera. Seattle Opera constructed and in December 2018 opened the $62M Opera Center headquarters adjacent to the McCall Hall performance venue. The 105,000 square foot building hosts the administrative offices, rehearsal halls, stage crew workshops, hair/make-up/wardrobe work areas, community program spaces, and a glass-box performance area. The building also hosts the Classical 98.1 KING-FM radio station headquarters. Pre-pandemic, Seattle Opera had an operating budget of $25M and annually issued 700 Form W2s to full and part-time employees, the majority of whom are represented by six collective bargaining units. Currently, Seattle Opera has 7,000 subscribers, approximately two-thirds of which are over the age of 50, and 90% of whom request parking with their annual subscriptions.

Classical KING FM 98.1

Classical KING FM 98.1 is the primary institution developing new audiences for classical music and the arts in Seattle, Bellevue, and the Puget Sound Region. In addition to creating programming that offers everyone in the region an opportunity to make classical music and the arts a part of daily life, Classical KING FM partners with arts and culture organizations of all size and scope in the region. We offer broadcast performances of local concerts as well as an opportunity for local musicians to perform on our signature Friday evening program *Northwest Focus LIVE.* Teachers and parents use Classical KING FM to introduce children to classical music, and the station has additional programs to supplement this important work. Through our popular Instrument Petting Zoos, the annual Young Artist Awards competition, and other partnerships, KING FM provides support for arts education in the region. More than 15,000 members are supporters of Classical KING FM, helping to pave the way for a bright future for the station, and bringing the richness of classical music to diverse audiences in the rapidly growing Puget Sound Region.

SIFF

For 48 years, SIFF has been creating experiences that bring people together to discover extraordinary films from around the world. In 2011, SIFF Film Center moved its main offices and classroom to Seattle Center and built a 90-seat jewel box, state-of-the-art movie theater. The Film Center at Seattle Center is one of the few independent art-house cinemas remaining in Seattle where communities can watch independent films together on the big screen, and get a direct connection to the movie's director, screenwriter, and actors. SIFF supports underrepresented communities such as showcasing Indigenous films by and about Native Americans giving a voice to storytelling from around the world through the universal themes of the environment, social justice, and the human experience. There is no other film organization in the Pacific Northwest with the depth and breadth of SIFF. SIFF also owns and operates the three-screen SIFF Uptown Cinema located just off of the Seattle Center grounds at the corner of Republican and Queen Anne Avenue.

Every year at SIFF (pre-Covid)

- Seattle International Film Festival showed (2019) over 400 films, from over 80 countries, and with over 45% women filmmakers
- Engaged over 8500 students in free education programs with filmmakers
- Distributed over 17,000 free tickets to underserved communities

Cornish College of the Arts

Founded in 1914, Cornish College of the Arts is a nationally recognized leader in the study of visual and performing arts offering undergraduate degrees in Art, Dance, Design, Film, Interior Architecture, Music, Performance Production, and Theater. The Cornish Playhouse serves as the nerve center for a wide range of internal curricular and external community base activities related to the college's mission. These facilities house classroom, office, studio, rehearsal, public meeting/conference room, gallery, and scene shop spaces. The Cornish Playhouse is used not only by the college but shared with other non-profit organizations and the general public as well. Each year 35-40 local non-profit organizations rely on the Playhouse to produce their events and shows. These are often companies that do not own their own space and, in some cases, have already been recently displaced due to other development in the city. Without the Playhouse companies like Whim W'Him Dance Company, Seattle Musical Theater, Show Tunes, and Theater Anonymous, just to note a few, who would have a nearly impossible task of finding equivalent space to produce. Even today with the venues in full operation, we have to turn down dozens of productions due to the limited space and time available. In addition to the shows, we provide space for groups to gather for meetings, tests, fundraisers, exhibitions and many more activities that support the creative economy. In the average year we see over 13,000 people engage at these facilities, not including Folklife and Bumbershoot which average an additional 10,000 audience members during their time in the Playhouse facilities. If construction activities unfold as currently proposed, Cornish is deeply concerned with its ability to continue carrying out any or all of the activities as previously described and the harm such an outcome may cause. The College currently enrolls 500 undergraduates and annually serves more than 300 youth and adult learners through extension programming. 88% of the College's undergraduates are from the State of Washington, and the majority of Cornish's alumni remain in the Puget Sound region after graduation, fueling the region's creative economy.

The Vera Project

The Vera Project is an all-ages nonprofit space dedicated to fostering personal and community transformation through collaborative, youth-driven engagement in music and art. A music venue, screen print shop, recording studio, art gallery, educational institution, and safe space for radical self-expression, VERA is a home to Seattle's creative community. As of 2022, we annually offer access and opportunity in the arts to over 35,000 young people, place youth audio engineers and production workers at every major venue and festival in King County, disburse tens of thousands of dollars in scholarships, train the next generation of youth community leaders, and feature more young, BIPOC artists on our stages than anywhere else in town.

Seattle Rep

Founded in 1963 by local citizens as an investment in a thriving city, Seattle Repertory Theatre was the very first performing arts institution to be located at Seattle Center. Nearly 60 years later, Seattle Rep anchors the NW corner of the campus in a two-theater facility that it has occupied continuously since 1983. Seattle Rep's mission is to collaborate with extraordinary artists to create productions and programs that reflect and elevate the diverse cultures, perspectives, and life experiences of the Pacific Northwest. Guided by the values of artistic vitality, sustainability, and generous and inclusive practices, Seattle Rep's vision is a world where theater sits at the heart of public life, positioning the work on its stages as a vital source for collective imagination, meaningful conversation, and healthy social debate. Seattle Rep reaches 150,000 audience members annually (pre-COVID) through its mainstage season, new play activities, arts engagement work, and Public Works programming. Each production is built onsite at Seattle Rep by an internal production team of skilled artisans and craftspeople that also supports other production needs throughout the city. Seattle Rep's resources and reputation attract theater professionals from across the country and world who are working at the top of their craft, earning Seattle Rep the 1990 Tony Award for Outstanding Regional Theater (awarded once in a theater's lifetime), and positioning Seattle Rep as a home for local artists and a national incubator and destination for great art. Over the course each season, Seattle Rep employs more than 400 individuals, including upwards of 50 carpenters, seamstresses, and painters.

PNW Ballet

Founded in 1972, Pacific Northwest Ballet (PNB) is one of the largest arts employers in the Puget Sound region and one of the top professional ballet training institutions in the country. PNB serves over 200,000 community members each year through mainstage performances, PNB School classes and productions, partnerships with Bellevue and Seattle Public Schools, dance education, community education programming, and tours. PNB is a key contributor to the artistic, economic, social, and cultural vibrancy of Puget Sound and beyond, driven by our guiding principle to inspire, engage, and educate through dance. While PNB distinguishes itself in the depth and breadth of its educational efforts, reinforcing its role as a community asset, the entire organization aspires to reflect and engage citizens in our region's diverse communities and ensure that all paths in to PNB are welcoming and inclusive.

MoPOP

Since opening in 2000, the Museum of Pop Culture has used the universal appeal of our content — be it anything from music, film, and television, to games, sports, and tattoos — to build connections and spark creativity. Having produced more than 100 exhibitions, reached more than 1 million young people through our educational programming, and stewarded more than 100,000 artifacts in our collection, we harness pop culture as a way to make creative expression a life changing force for our visitors. As a nonprofit institution in Seattle, we proudly showcase the Pacific Northwest's pop culture history and empower young people in our community — especially those with limited access to creative opportunities — to see themselves as tomorrow's visionaries and risk-takers. We are also an international destination as a gateway to American cultural heritage having reached more than 11

million people across six continents. But no matter where you're from, MoPOP offers experiences that inspire and connect.

Our comments on the DEIS are as follows:

A. Chapter 2 ALTERNATIVES CONSIDERED

2.1.2.2.3 Downtown Segment

SEPA and NEPA do not require that all reasonable alternatives be studied, but a reasonable number and range must be studied. WAC 197-11-440(5)(b)(i), (c)(vi). The DEIS provides only two alternatives for the Seattle Center Station and they are only a block apart. This is an inadequate number of alternatives given that both Seattle Center Station alternatives have significant impacts. At least one or two more alternatives including an alternative that serves Seattle center from its south side, should be included in the DEIS.

B. 2.5.1 Development of DEIS Alternatives

p. 2-79 Evaluation Criteria used for evaluating alternatives do not include consideration of sensitive receivers which should be a criterion given the large number of sensitive receptors on the north side of Seattle Center.

comment: Another important failure of the DEIS is to provide adequate information regarding Alternative DT-2. There is inadequate discussion and analysis of the impacts of this alternative, particularly regarding access impacts from street closures and noise and vibration impacts.

C. 2.6.2 Typical Construction Activities

p. 2-85 The DEIS notes that dewatering could be needed throughout the project corridor. However, there is no analysis of what impacts this might have on structures in the vicinity of the dewatering.

comment: The NW Rooms experienced cracked floors on account of the dewatering that occurred in conjunction with the Arena Renovation in 2019. Further analysis of dewatering impacts to the NW Rooms, Seattle Rep, and Cornish should be conducted.

D. Chapter 3 TRANSPORTATION

3.19.4.1 Arterial and Local Street Operations

Table 3-30 summarizes the major construction closures for the Downtown Segment. There are significant closures noted for the Seattle Center Station construction:

1. Republican Street Queen Anne Avenue North to Warren Avenue North: Full closure, 5 years (includes 15- month full closure of intersection at 1st Avenue North);

2. Mercer Street/West Mercer Street Warren Avenue North to 1st Avenue West: Partial closure, 3.5 years; and

3. Harrison Street for construction of the South Lake Union Station.

comment: These are significant impacts to the NWR Occupants, Seattle Rep, Cornish, and the organizations on the east side of the Seattle Center campus. Republican Street is a critical access point for the NW Rooms. Republican Street is used extensively by KEXP and The Vera Project for unloading and loading of equipment used by musicians who perform in their spaces. Collectively, these two organizations have approximately 600 such performances per year. Loss of this road for five years will have a significant adverse impact on their ability to fulfill important parts of their missions. Similarly, construction of the South Lake Union Station will have significant adverse impacts to the Clients on the east side of Seattle Center.

There will also be closures of August Wilson Way and portions of 2nd Avenue N. for five years or more as these streets will be used for construction and construction staging. These closures have a very significant adverse impact to Seattle Rep and Cornish as they use these streets for access and ADA parking.

Portions of 1st Avenue N. both north and south of Republican Street will also be closed for construction staging which will further exacerbate impacts to access and loading operations for the NWR Occupants. Republican and 1st Avenue N. is also where dedicated school bus parking is located so this closure will limit access to Seattle Center for groups of school children. The parenthetical reference to the closure of Seattle Republican and 1st Avenue N. intersection does not reflect the significant disruption to traffic and transit service needing to cross the construction zone.

The cumulative effect of these closures has not been adequately addressed, and the mitigation suggested for these impacts is totally insufficient. Sound Transit has not analyzed sufficiently temporary rerouting of traffic needed on account of street closures. The DEIS notes there are alternative access point to Seattle Center even though such alternatives will not provide the necessary access for the NWR Occupants, Seattle Rep, or Cornish. Although the closures are "temporary" that temporary period will last five or more years. Five years is a very long period for these non-profit arts and cultural organizations to be unable to fulfill their missions.

Besides the impacts to the Clients the DEIS does not detail viable detours that will be required for the street closures. Moreover, there is no analysis of the resulting levels of service at intersections that are part of the detour route. Traffic around Seattle Center can be problematic when all streets are

open, but when key links are closed for significant periods of time, traffic will be incredibly bad and the DEIS does nothing to evaluate this significant impact.

E. Chapter 4 AFFECTED ENVIRONMENT

4.3.3 Economics

p. 4.3.3-15 The DEIS notes with either alternative, road and lane closures around the Seattle Center Station would cause increased congestion in the area and could make access to Climate Pledge Arena and other Seattle Center venues and amenities more difficult. Project construction is not expected to notably affect attendance at larger events and performances, such as hockey games. However, there could be effects on event attendance and revenue for smaller non-profit events.

comment: The DEIS is inadequate for failing to quantify more precisely the significant financial impacts on smaller events and festivals. The impacts noted are more severe than suggested. The street closures and increased congestion will have a large and potentially devastating effect upon smaller venues and festivals that may cease to exist on account of the significant financial impact. The assumption that attendance at larger events such as hockey games will not be notably affected is also not substantiated. Large events may also suffer a decrease in attendance creating a significant adverse financial impact.

p. 4.3.3-15 The DEIS notes with Preferred Alternative DT-1, the closure of 2nd Avenue North and August Wilson Way during construction could affect access for maintenance and event vehicles in this area.

comment: The DEIS is inadequate for failing to note the closures of Republican Street, and 1st Avenue N. The cumulative effect of these street closures will have a significant impact on the Clients due to lack of access by delivery vehicles and vehicles bringing performers and their equipment to the NW Rooms, Seattle Rep, and Cornish.

p. 4.3.3-15 The DEIS notes that during construction, Sound Transit would coordinate with Seattle Center to minimize impacts to events on the campus and to permanent tenants. Impacts to freight mobility and access would be minimal and are described in Section 3.19.4.6, Freight and Mobility Access, in Chapter 3.

comment: The DEIS is inadequate for failing to recognize the significance of the impacts caused by the street closures required for Preferred Alternative DT-1. The construction impacts will have a large detrimental impact on attendance for organizations that have struggled with holding events and getting patrons to attend during the two plus years of COVID-19 pandemic.

p. 4.3.3-18 The DEIS notes that construction might cause adverse impacts on businesses due to reduced access or general construction activity. Mitigation measures presented in Chapter 3 and Section 4.3.1 and in Section 4.3.5, Visual and Aesthetics, and Section 4.3.7, Noise and Vibration, would

minimize these impacts. Construction management plans would be developed to address the needs of businesses and could include, but are not limited to, seven specified measures.

comment: The proposed mitigation measures are inadequate if vehicles, performing artists and their equipment, and viewers cannot get to the NW Rooms, Seattle Rep, and Cornish. The Clients are being surrounded by a significant construction zone for five or more years which will cause significant adverse economic impacts to the Clients.

4.3.4 Social Resources, Community Facilities, and Neighborhoods

p. 4.3.4-9 The DEIS notes that Seattle Center is a publicly owned recreational area, arts hub, and tourist destination, attracting over 12 million annual visitors. It is home to roughly 30 arts and cultural organizations and hosts thousands of events annually, including several of Seattle's largest signature community events and festivals. Seattle Center also functions as an emergency shelter when needed.

comment: The DEIS is inadequate for failing to account adequately for the significant adverse social impacts that will result from construction of a station on the Seattle Center Campus and the consequent inability of Seattle Center to accommodate the many events that depend on access to the venues and the inability of the venues to function due to construction impacts. The DEIS needs to recognize the arts, science, and sports "ecosystem" that exists at Seattle Center and how the loss of one or two organizations can cause the entire to ecosystem to potentially fail.

p. 4.3.4-23 The DEIS notes that Cornish Playhouse, Seattle Repertory Theatre, The Vera Project, the Seattle International Film Festival Film Center, and KEXP radio station and recording studio facility may be affected by construction noise or vibration. Construction would also temporarily prevent access along 2nd Avenue North (now a pedestrian walkway within Seattle Center and used by Seattle Center maintenance and event vehicles) and impact access to Seattle Center in this location. Construction of Alternative DT-2 could also have vibration or ground borne noise impacts on the Seattle Repertory Theatre, Seattle Opera and KING FM, and McCaw Hall.

comment: The DEIS is inadequate for failing to consider the other significant impacts from closing Republican Street, August Wilson Way, and 1st Avenue N.; for providing inadequate disclosure of the noise and vibration impacts to the Clients; and for failing to disclose the potential loss of events and festivals for five or more years during construction, a significant adverse social impact. The impact on youth and education as field trips by school children become infeasible due to construction impacts is also ignored by the DEIS.

F. 4.3.6 Air Quality

4.3.6.6 Mitigation Measures

The DEIS states the air pollutant and greenhouse gas emissions analyses demonstrated that no substantial air quality impacts are expected to occur during the operation and construction of the project; therefore, no mitigation measures would be required.

This statement of no air quality impacts is a gross oversimplification of the facts. The NWR Occupants, Seattle Rep, and Cornish are essentially going to be existing in a construction site with station construction occurring on one side of them and construction staging occurring on Warren Avenue and 1st Avenue N. Exhaust emissions from construction equipment and dust from the excavation and construction will significantly impact air quality for these organizations. Increased dust is problematic for SIFF's projection equipment and screens, for the sound equipment at KEXP and the Vera Project, for Climate Pledge Arena's sophisticated audio-visual system, and for the throats and lungs of vocalists and dancers who perform for Seattle Opera, PNW Ballet, Seattle Rep, Cornish, and the other arts groups that utilize McCall Hall, Seattle Rep theaters, and Cornish Playhouse.

G. 4.3.7 Noise and Vibration

Table 4.3.7-2 of the DEIS notes that the Clients' buildings are Category 1 and Special Building Vibration-Sensitive Receivers.

comment: Noise and vibration impacts, particularly during construction, are significant adverse impacts to the Clients. These are all arts and cultural organizations that require a quiet environment and feature live performances with music, dance, theater, and recording sessions. They are all Category 1 and Special Building receivers. Exhibits A and B to this letter are noise and vibration analyses performed by Landau Associates for KEXP and Seattle Rep, respectively, detailing the significant noise/vibration impacts to be experienced by the NWR Occupants, Seattle Rep, and Cornish as a result of construction of the Preferred Alternative DT-1 and Alternative DT-2.

p. 4.3.7-12 The DEIS states the Preferred Alternative DT-1 would have vibration impacts at Seattle Center Category 1 special buildings including KEXP radio station, Seattle Repertory Theatre, the Seattle International Film Festival (SIFF) Film Center, and The Vera Project.

comment: The DEIS fails to include Cornish, MoPOP, and SIFF Uptown Theater among the impacted buildings. MoPOP's building is almost exclusively a steel structure, which has a high possibility of amplifying ground vibrations throughout and suffering negative impacts to the integrity of the building's features and artifacts.

4.3.7.4.1 Noise

p. 4.3.7-17 The DEIS notes the cut-and-cover construction of the Seattle Center Station for Preferred Alternative DT-1 would likely result in noise impacts at the NW Rooms at Seattle Center, which house several noise-sensitive spaces including KEXP, the Vera Project, the SIFF Film Center, and the A/NT Art Gallery. The construction noise would also impact spaces in the north end of Seattle Center, including Seattle Rep and Cornish. Cut-and cover construction of the Seattle Center Station for Alternative DT-2 could result in noise impacts at the Seattle Repertory Theatre and Cornish Playhouse.

comment: Given the particularly significant noise impacts from the cut-and-cover method, the DEIS should evaluate alternative construction techniques such as mining to mitigate these significant adverse noise impacts.

4.3.7.4.2 Vibration

Table 4.3.7-9. Groundborne Noise and Vibration Impacts at Category 1 and Special Buildings During Construction – Ballard Link Extension Sensitive Receiver Alternatives with Impact
This table fails to include Pacific Northwest Ballet and SIFF Uptown Theater.

p. 4.3.7-21 The DEIS states, that where construction would be in close proximity to sensitive Category 1 performance or recording spaces, Sound Transit would work with the venue to coordinate periods of the loudest construction noise around their events. If the loudest work could not be scheduled around performances, Sound Transit would coordinate with the venue regarding modifications to their facility or temporary relocation.
comment: Given that the most affected Clients operate during the day and the evening, rescheduling is not likely to be feasible. This is especially so for Seattle Children's Theater and other Clients who provide events for school children during the day Monday through Friday. Similarly, modifying their facilities is not likely to be successful given the proximity of the noise and vibration, literally next to their building walls. Based on the Landau data and the FTA thresholds in the DEIS, tenants of the NW Rooms will face construction noise and vibration impacts that will likely make ordinary course operations impossible. For example, the ambient noise level in the KEXP Audio Edit 2 studio, as measured by Landau, is 24 dBA, which lines up with the applicable FTA threshold of 25 dBA for this space. The DEIS contemplates ground borne noise levels from tunneling at 42 dBA, a very perceptible 18-dBA increase over ambient levels. This increase would be perceived as approximately 3.5 times louder than ambient levels and the applicable FTA threshold. Similar impacts are anticipated from airborne noise generated from surface construction north of the building. Landau anticipates that ground borne noise impacts from Republican Street demolition and below-grade slurry wall demolition may be even higher, although the DEIS does not provide an estimate of these impacts. The DEIS statement that NW Rooms tenants "may" be required to relocate during construction should read "will likely be required to relocate."

Thus, due to the expected significant impacts from road closures and construction noise and vibration, temporary relocation will likely be required if the Preferred Alternative DT-1 Seattle Center Station location remains the preferred one. However, temporary relocation may not be possible for the Clients. These arts and cultural organizations have very specialized spaces and finding a replacement space in Seattle may not be possible. This could result in the permanent loss of those organizations.

H. 4.3.11 Geology and Soils

4.3.11.4.3 Groundwater

p. 4.3.11-8 As noted above, the DEIS notes that high groundwater levels make soils less stable during excavation and could also require dewatering during construction. Dewatering would likely be needed during construction of all Downtown Stations: Midtown, Westlake, Denny, South Lake Union, and Seattle Center. Saturated soils could flow when disturbed and increase the potential for volume loss and settlement.

comment: This was substantiated during the renovation of the Arena when KEXP experienced cracked floors. The DEIS states no mitigation is required. This is an inadequate response. The NW Rooms is a Seattle landmark, is over 60 years old, and deserves further analysis and protection from this potentially significant impact.

I. 4.3.16 Historic and Archeological Resources

Table 4.3.16-5. Effects to Built Environment Historic Properties: Downtown Segment p. 4.3.16-30 This table states for Survey Number 1396a the International Commerce and Industry Building, which is another name for the NW Rooms, is Adversely Affected with the Preferred Alternative DT-1 due to Construction Disruption and Permanent Proximity Effects.

comment: The DEIS fails to note Cornish Playhouse is eligible for listing in the National Historic Register and the International Plaza in front to the NW Rooms is landmarked. Moreover, no mitigation is proposed for these significant adverse impacts. Evaluation of appropriate and feasible mitigation should be done.

p. 228, Appendix N.5 The DEIS notes that one historic property, the NW Rooms, would be adversely affected due to construction impacts. The north façade canopy would be removed during construction and rebuilt after construction. Overall, Preferred Alternative DT-1 would diminish the building's integrity of materials, setting, and feeling.

comment: The DEIS is inadequate for providing no explanation of the duration, nature or severity of the diminished integrity and not providing appropriate mitigation. As an important historical structure with a landmark designation, the buildings' integrity should not be diminished.

J. 4.3.17 Parks and Recreational Resources

p. 4.3.17-10 The DEIS notes Figure 4.3.17-6 shows the permanent impacts to this resource from Alternative DT-1, which would permanently impact Seattle Center for a Seattle Center Station entrance. The entrance would be on the east side of the Seattle Repertory Theatre and could remove the southern exit to the Seattle Repertory Theatre, as well as landscaping, which includes Donnelly Garden and Theater Commons. Views of the International Fountain and the Space Needle from the Seattle Repertory Theatre lobby could be blocked by the station entrance. The station would be primarily under

Republican Street but would extend to the south under the NW Rooms. Potential vibration impacts during operation are discussed in Section 4.3.7, Noise and Vibration. Alternative DT-2 could require a small area of underground easement on the northwest corner of the Seattle Repertory Theatre, but this would not affect the current use of this property.

comment: The DEIS is inadequate for failing to include removal of exceptional trees along August Wilson Way as a permanent impact, discuss the loss of approximately half an acre of open space, or mention the loss of space to accommodate the festivals at Seattle Center.

p. 4.3.17-19 The DEIS notes that Figure 4.3.17-6 shows the temporary construction impacts to this resource from the Downtown Segment alternatives. Preferred Alternative DT-1 would have temporary impacts to Seattle Center for construction of a Seattle Center Station entrance for up to 6 years, plus time for park restoration. Construction activities and staging would occur for this cut-and-cover station entrance in front of the Seattle Repertory Theatre, in a landscaped area known as Donnelly Garden and Theater Commons.

comment: The DEIS is inadequate for failing to provide any mitigation for these impacts. Alternative construction techniques such as mining to create the station should be evaluated.

p. 4.3.17-19 The DEIS notes that cut-and-cover construction would also occur on Republican Street, east of 1st Avenue North, to the north of the Northwest Rooms. The Northwest Rooms house KEXP radio station, the Vera Project, and the Seattle International Film Festival Film Center. These facilities in the NW Rooms are expected to continue to operate during construction, but temporary relocation may also be considered due to noise and vibration impacts.

comment: The DEIS is inadequate for failing to consider alternative construction techniques such as mining to construct he station. The suggestion that the residents of the NW Rooms could relocate is not sufficient mitigation as there may not be suitable space that can accommodate all the functions provided in the NW Rooms.

p. 4.3.17-19 The DEIS notes that access from Mercer Street to August Wilson Way on the east side of the Seattle Repertory Theatre (2nd Avenue North) would be closed during construction, but other access points exist to the west and east along Mercer Street. This would affect non-motorized access as well as campus maintenance and delivery access that uses this roadway. It is expected the theatre would maintain operation during construction, accessible from the main entrance off Mercer Street. Access to Seattle Center from the west along Republican Street and August Wilson Way would also be closed, but access farther south at the current Climate Pledge Arena and Thomas Street would be maintained. Seattle Center events and activities are expected to be able to continue during construction. Mature trees along August Wilson Way that are designated as Exceptional Trees by the City would be removed for construction. New landscaping would be provided after construction in coordination with the City of Seattle and Seattle Center. Public artwork at 2nd Avenue North and August Wilson Way would also be removed during construction but would be replaced following construction. Sound Transit would coordinate with Seattle Center during final design regarding construction phasing and timing for work

on and near the campus to minimize the construction impacts described above on events at the campus as well as permanent campus tenants.

comment: The DEIS is inadequate for providing inadequate mitigation for significant construction impacts. Loss of access is a significant operational impact for arts and cultural organizations who must move equipment and materials in and out of their performance spaces. Providing new landscaping is insufficient mitigation for the loss of exceptional trees. While coordination is appreciated, it is not mitigation for the significant impacts that cannot be avoided.

p. 4.3.17-20 The DEIS notes that Alternative DT-2 would require partial closure of Mercer Street for 3.5 years, between Warren Avenue North and 1st Avenue North, for construction of the Seattle Center Station, which would affect access to the north side of Seattle Center from Mercer Street. Closure of Mercer Street would affect traffic in this area and could make passenger and vehicle access to parking and event loading areas for Seattle Center more difficult. Sound Transit would coordinate with the Seattle Center for road closures during construction in order to minimize impacts on access. **comment:** The DEIS is inadequate for noting the impacts but providing inadequate mitigation. Coordination will not ameliorate the impacts. In addition, the conceptual drawing of the Mercer station shown in Appendix J, Drawing B11-ASP700 shows cut-and-cover disrupting one additional block and two major intersections of Mercer (Mercer and Queen Anne, and Mercer and 1st Ave W) for a scissors cross-over. Which is accurate, the drawing, or the text of the DEIS?

K. 4.3.18 Section 4(f) Summary

Under Section 4(f) of the United States Transportation Act of 1966, 49 U.S.C. 303(c), the FTA cannot approve the "use" of a Section 4(f) resource unless it determines that:

- There is no feasible and prudent avoidance alternative to the use of land from the property; and the action includes all possible planning to minimize harm to the property resulting from such use; or

- The use of the property, including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) committed to by the applicant, will have a de minimis impact on the property.

Table 4.3.18-4 In this table the DEIS states that the Preferred Alternative DT-1 will have *de minimis* impact on the Seattle Center and Alternative DT-2 will have no use/temporary occupancy of Seattle Center.

comment: There is certainly a feasible and prudent avoidance alternative and the action has not included all possible planning to minimize harm to the property, so the first finding cannot be made. The DEIS concludes, however, there is a *de minimis* impact in order to satisfy the second finding. This conclusion is clearly wrong. The impacts of constructing a light rail station in the location proposed for

Preferred Alternative DT-1 are significant. Open space will be lost permanently. Festival space will be lost permanently. The Donnelly Garde and Theater Commons as well as the beautiful mature exceptional trees along August Wilson Way will be lost permanently. Construction of the proposed station also may result in the loss of valuable arts and cultural organizations for five or more years, and they may or may not return. Such impacts are not *de minimis*. The Section 4(f) analysis is incorrect and inadequate.

L. Failure to Provide Timely Information to Decision Makers.

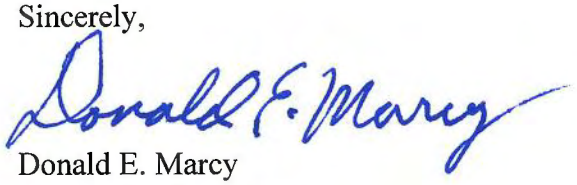
The DEIS is also inadequate because it fails to provide adequate information to decision makers by the time alignment and station locations are to be recommended by the Sound Transit Board in June of 2022. This inadequacy is all the more striking because the Sound Transit Board will be acting contrary to the requirements of WAC 197-11-070 by taking action that will limit the choice of reasonable alternatives prior to the issuance of the Final EIS.

Conclusion

The DEIS has not adequately analyzed the significant adverse environmental impacts associated with putting the Seattle Center Station at the location proposed in Preferred alternative DT-1. The significant impacts that will be created for the arts and cultural organizations in close proximity to the proposed station are enormous and cannot be mitigated without relocation of the organizations which creates other issues because adequate spaces do not exist in Seattle. Yet the organizations are put into a purgatory where they do not know whether the construction impacts can be mitigated or whether they need to relocate owing mostly to the construction methods not being finalized for a couple of years after the Sound Transit Board selects a proposed route. The DEIS does not discuss this very possible occurrence which in turn could lead to the permanent loss of valuable arts and cultural organizations. The only logical solution is to place the Seattle Center Station at a location other than that shown for Preferred Alternative DT-1.

Thank you for the opportunity to comment on the DEIS. If you have any questions regarding the foregoing comments, please contact the undersigned.

Sincerely,



Donald E. Marcy
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cc: Jane Zalutsky, Executive Director Seattle Center Foundation
Brenda Barnes, CEO Classical KING FM 98.1
Raymond Tymas-Jones, President Cornish College of the Arts
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Clare Hausman, Sr. Director Strategic Initiatives, Seattle Children's Theater
Tom Mara, Executive Director KEXP
Christina Scheppelmann, General Director Seattle Opera
Ellen Walker, Executive Director Pacific Northwest Ballet
Jason Clackley, Program Manager The Vera Project
Alexis Lee, Executive Director MoPOP
David Cornfield, Board Member Seattle International Film Festival

EXHIBIT A

April 26, 2022

KEXP
472 1st Avenue N
Seattle, WA 98109

Attn: Jamie Alls

Transmitted via email to: *jalls@kexp.org*

Re: Sound Transit WSBLE DEIS Review for KEXP
Seattle, Washington
Project No. 2055001.010

Dear Jamie:

At the request of KEXP, Landau Associates, Inc. (Landau) prepared this summary of our assessment of the noise and vibration sections of the Sound Transit West Seattle and Ballard Link Extensions (WSBLE) Draft Environmental Impact Statement (DEIS).

Landau understands that KEXP has concerns regarding the proposed WSBLE project, specifically the preferred alternative Downtown-1 (DT-1) alignment that includes the Seattle Center Station. The station would be located immediately adjacent to the north of KEXP. Specific to this letter report, Landau understands that KEXP is concerned that construction and operation of DT-1 may result in noise and vibration impacts that could inhibit the use of some facilities within KEXP, such as for recording and live broadcasts.

KEXP has retained Landau noise and vibration expert consultants to review the DEIS and provide comment on the document's accuracy and completeness regarding assessment of noise and vibration impact. Further, Landau has been asked to provide additional supporting information as needed to inform this review.

This letter report summarizes Landau's assessment of the DEIS noise and vibration section and technical appendix as it relates to the potential for impact to KEXP, and includes a summary of our findings, a list of documents that were reviewed, and a detailed review of selected chapters of the DEIS.

Summary

Landau finds the assumptions and methods used by Sound Transit to analyze noise and vibration impacts to be reasonably correct. However, Landau finds some elements of the WSBLE DEIS analysis to be incomplete and/or incorrect. These missing or incorrect analysis elements result in an

incomplete assessment of noise and vibration impacts and mitigation. The key findings of this review include:

- City of Seattle (City) noise limits are not applied in the construction noise impact section when determining the potential for noise impacts and whether additional mitigation is warranted.
- There are missing receptors, including the Northwest Plaza, an outdoor use area between KEXP and the Climate Pledge Arena.
- The noise limit used for the KEXP Mastering Suite (now Production 1 and 2) is incorrect.
- The assessment of airborne noise impacts during construction is incomplete.
- An assessment of mitigation measures is required for expected airborne noise impacts at KEXP.
- Additional assessments of groundborne noise and vibration mitigation measures from construction are warranted to fully address impacts from preferred alternative DT-1.
- Station construction methods for DT-1 include breaking a slurry wall with a hoe ram, a potential major source of groundborne noise and vibration that was not evaluated.
- Operational groundborne noise impacts warrant additional assessment of proposed high-resilience fasteners as mitigation for DT-1.

Landau's assessment focused on the DT-1 alignment identified in the WSBLE DEIS. Downtown-2 (DT-2) is located sufficiently far from KEXP facilities that impacts from construction and operation of DT-2 are unlikely at KEXP.

Review Documents

Landau reviewed the following documents in support of the assessment:

- Sound Transit and Federal Transit Administration's (FTA's) WSBLE DEIS, Chapter 4.2.7: Noise and Vibration (pp. 4.2.7-1 to 4.2.7-23) (USDOT et al. 2022a)
- Sound Transit and FTA's WSBLE DEIS, Appendix N.3: Noise and Vibration Technical Report (USDOT et al. 2022b)
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3A: Noise Measurement Data, Site Details, and Photographs
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3B: Vibration Measurement Site Photographs
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3C: Vibration Propagation Measurement Results
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3D: Maps of Noise Impact Assessment
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3E: Maps of Vibration Impact Assessment
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3F: Tables of Noise Predictions
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3G: Tables of Vibration Predictions

- Sound Transit and FTA's WSBLE DEIS, Attachment N.3H: Vibration Analysis of Category 1 Land Uses and Special Buildings
- FTA's *Transit Noise and Vibration Impact Assessment Manual* (FTA Guidance Manual; FTA 2018)
- Sound Transit's Design Criteria Manual, Revision 5, Amendment 11 (Sound Transit 2021).

Review Format

The following review of the DEIS has been organized by the chapters in DEIS Appendix N.3. The headings in the follow review therefore represent the chapter numbers in DEIS Appendix N.3.

Landau's assessment focused on chapters in the WSBLE DEIS that are relevant to the assessment of noise and vibration impacts at KEXP from DT-1. Headings that begin with "Chapter" refer to the corresponding chapter in WSBLE DEIS Appendix N.3: Noise and Vibration Technical Report (USDOT et al. 2022b).

Chapter 3: Noise and Vibration Impact Criteria

The WSBLE DEIS applies the noise and vibration impact criteria established for transit projects according to the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA 2018). Sound Transit is a public transit authority that receives federal funding to support its projects. Landau finds the use of the FTA criteria to be appropriate for assessment of noise and vibration impacts from this project.

WSBLE DEIS Appendix N.3, Chapter 3.1.3 identifies the City noise criteria, as established in Chapter 25.08 of the Seattle Municipal Code (SMC). SMC noise limits are applicable during daytime and nighttime hours for various source and receiving "Districts." Further, SMC 25.08 includes sound level limits that apply specifically to construction. Landau finds the DEIS interpretation of the City's noise criteria to be correct.

Landau finds that the assessment does not identify impacts relative to the City's noise criteria. That is, the assessment is focused only on FTA criteria (that are applicable) and on whether construction or operation would meet FTA criteria. The assessment refers to the required compliance with City construction noise limits in WSBLE DEIS Appendix N.3, Chapter 7, Construction Noise Mitigation (p. 7-16), but not when evaluating the potential for noise impacts throughout Seattle Center. Because City construction noise limits apply to this project, the noise assessment should consider whether construction noise is expected to meet these limits. If the project cannot meet these limits, sufficient noise mitigation measures should be required; otherwise, alternative construction methods should be explored.

Chapter 4: Noise and Vibration Impact Analysis Assumptions and Methods

WSBLE DEIS Appendix N.3, Chapter 4 summarizes the analysis assumptions and the methods for assessment of noise and vibration impacts. This chapter reviews multiple elements that are considered when predicting noise and vibration emissions from light rail projects and includes results of vibration propagation testing and discusses noise and vibration measurements made by Sound Transit to support the noise and vibration impact assessment. Landau finds the impact analysis assumptions and methods to be reasonably correct.

Chapter 6: Impact Assessment

The following summarizes Landau's review of the WSBLE DEIS impact assessment of DT-1, including airborne noise from construction and groundborne noise and vibration from construction and operation, as received at KEXP. The Station Area Below Grade figure on p. 3 of the KEXP Sound Transit Construction Impact, April 26, 2022 presentation (KEXP Presentation; Attachment 1) provides an area map that shows the location of KEXP relative to the location of DT-1, including the rail alignment, station platform, and construction area extents, as well as nearby Seattle Center resident organizations and facilities.

Noise and Vibration Limits

WSBLE DEIS Appendix N.3, Chapter 6.4 (p. 6-63) indicates that noise and vibration from construction, including tunneling (cutterhead and supply train) and surface construction, were compared to the same FTA operational noise limits "because this can be a relatively long-term activity." Landau agrees with this determination.

Landau notes that the noise limits in WSBLE DEIS Appendix N.3 are generally correct for most resident organizations within the Seattle Center. However, a required adjustment and an omission were noted for KEXP, as summarized below.

Noise and Vibration Limits – Adjustments

Landau notes that adjustments to the operational (and construction) groundborne noise and vibration limits at the Mastering Suite within KEXP are warranted following measurements by Landau staff and review of the noise- and vibration-sensitive nature of this space. That is, because the Mastering Suite (now Production 1 and Production 2) is used for audio recording, a noise limit of 30 A-weighted decibels (dBA), as provided in the DEIS, is not appropriate. An adjusted noise limit to 25 dBA aligns with the FTA criteria for a "Recording Studio."

A summary of the recommended adjustments to the groundborne noise and vibration limits, including a rationale for the adjustments, is provided in Table 1 below.

Table 1: DEIS Appendix N.3 KEXP Noise and Vibration Limit Adjustments

KEXP Space	DEIS Limits for Operation and Construction (a)		Recommended Adjustments to DEIS Limits (b)		Notes Justification for Adjusted Limits
	Noise (dBA)	Vibration (VdB)	Noise (dBA)	Vibration (VdB)	
Mastering Suite	30	72	25 dBA	65 VdB	Noise limit is appropriate as "Recording Studio" per FTA Guidance Manual, confirmed through Landau measurements.
(a) Sound Transit WSBLE DEIS Appendix N.3, Attachment N.3H, Tables 8-2 and 8-3. (b) Based on use of Mastering Suite (Production 1 and 2) as an audio recording space. dBA = A-weighted decibels VdB = vibration decibels					

Noise and Vibration – Missing Sensitive Receivers

Landau finds that WSBLE DEIS Appendix N.3 omits the International Plaza, also known as the Northwest Courtyards. The International Plaza is a hardscape area between the Northwest Rooms and Climate Pledge Arena. Northwest Courtyards will be used by KEXP to host future outdoor performances. This area also includes the historic DuPen Fountain, a popular family recreation spot in the summer, and is used heavily during campus events and festivals.

The International Plaza is likely to be impacted by DT-1 construction noise and is classified as an FTA Category 1 noise-sensitive receiver. FTA defines Category 1 receivers as "Land where quiet is an essential element of its intended purpose. Example land uses include preserved land for serenity and quiet, outdoor amphitheaters and concert pavilions, and national historic landmarks with considerable outdoor use." A summary of the missing noise-sensitive receiver is provided in Table 2 below.

Table 2: DEIS Appendix N.3 Missing KEXP Noise and Vibration Sensitive Receiver

Omitted Facility	Suggested Noise and Vibration Limits	Summary of Use	Potential Source(s) of Noise or Vibration Impact (b)
International Plaza	FTA Category 1 Noise Limits (a)	Recreational Outdoor Use Area, Concerts	DT-1 Surface Construction
(a) Outdoor use areas at Seattle Center are subject to FTA noise limits for a Category 1 receiver. Applicable noise limits are based on ambient levels; the City of Seattle construction noise limits identified in the Seattle Municipal Code (SMC) Chapter 25.08 also apply. (b) Potential for impact may be due to activities identified in this table and may also include activities not identified here. A complete assessment is required.			

Chapter 6.2: Construction Noise Impacts

The construction noise impact assessment (i.e., airborne noise) was completed using the methods described in the FTA Guidance Manual.

Chapters 6.2.1.5 (Tunneling) and 6.2.1.6 (Cut-and-Cover)

WSBLE DEIS Appendix N.3, Chapter 6.2.1.5 summarizes surface-level construction noise that would occur in support of tunneling operations; WSBLE DEIS Appendix N.3, Chapter 6.2.1.6 summarizes surface-level construction noise that would occur in support of cut-and-cover station construction.

As identified in WSBLE DEIS Appendix N.3, Table 6-30, the location of the cut-and-cover construction area for DT-1 could be as near as 8 feet from KEXP. Therefore, noise from excavation of the cut-and-cover station would be near enough to result in potential impact to operations at KEXP.

WSBLE DEIS Appendix N.3, Chapter 6.2.1.5 identifies the use of excavators and backhoes for portal and shaft excavation, and of trucks and loaders for transporting spoils. In addition, WSBLE DEIS Appendix N.3, Chapter 6.2.1.5 identifies ventilation fans that "would likely run continuously to provide fresh air to construction crews working inside the tunnel." For cut-and-cover construction, Chapter 6.2.1.6 identifies haul trucks and vibratory rollers as the loudest sources of construction noise, "over 88 dBA at 50 feet."

Landau finds that the DEIS does not fully evaluate the potential for impact from surface noise construction of stations or station entrances. Specifically, the following activities (i.e., sources of surface construction noise) were either not identified in the DEIS or additional information is required.

Tunnel Exhaust Fans

DEIS Chapter 6.2.1.5 states that "Ventilation fans would likely run continuously to provide fresh air to construction crews working inside the tunnel". Further, the DEIS states that "sound levels near the tunnel portals may be over 86 dBA at 50 feet from construction activities". DEIS Chapter 2.6.6, p 2-88 states that "fans could run for 24 hours a day and could be audible at tunnel portals, stations, or access locations."

Given the high volume of air required to maintain fresh air for construction workers, and the proximity of KEXP to the station and potentially to the tunnel portals, additional information is required to fully identify noise impacts from exhaust fans.

Truck Haul Routes

DEIS Chapter 2.6.6 (p. 2-88) states, "truck hauling would require a loading area, staging space for trucks awaiting loading, and provisions to prevent tracking soil on public streets. Truck haul routes and trucking hours would require approval by the City of Seattle. Surface hauling could occur at night

during off-peak traffic periods or could be concentrated during the day to minimize noise in noise-sensitive areas." Table 7-1 of the FTA Guidance Manual (p. 176) identifies a sound level for haul trucks of 84 dBA at 50 feet.

The DEIS does not include assessment of noise from haul trucks. Noise from haul trucks includes engine idling during loading, travel to and from loading locations, and banging noise when trucks drive over uneven or unsecured surfaces that are often found at and near construction sites. Airborne noise from haul trucks collecting and moving spoils away from the DT-1 station, located very near KEXP, could represent major sources of noise.

As indicated in the DEIS, haul trucks may operate during daytime or nighttime hours, depending on the permitted hours of hauling. KEXP operates noise-sensitive recording spaces 24 hours per day, and therefore impacts from truck hauling may impact KEXP during any hour of the day or night.

Construction Staging Areas

Noise from construction staging areas was not evaluated in the DEIS. Airborne noise from equipment moving within and to/from staging areas could represent a major source of airborne noise during construction.

Given the potential near proximity of KEXP to construction staging areas, an assessment of noise impact from staging areas should be completed.

Cut and Cover Construction

WSBLE DEIS Appendix N.3, Chapter 6.2 (p. 6-30) identifies construction activities that would produce the highest levels of airborne construction noise and includes tunneling and cut-and-cover station construction proposed for preferred alternative DT-1, which would occur immediately adjacent to KEXP. Landau finds this section to be incomplete based on predicted levels of construction noise.

Appendix N.3, Table 6-8 (p. 6-31) of the WSBLE DEIS provides a range of sound levels, referenced to 50 feet, that are anticipated from tunneling and cut-and-cover construction. Sound levels are based on the FTA Guidance Manual. As identified in Table 6-30 (p. 6-70), and as illustrated in DEIS Drawing B11-ASX102, construction activities could occur as near as 8 feet from KEXP. Table 3 below identifies noise levels from construction summarized in DEIS Table 6-8, and calculates sound levels at 50 feet, 15 feet, and 8 feet from construction equipment. Distance adjustments are based on noise propagation from a stationary source at +6 dBA per halving of distance to the source.

Table 3: Surface Construction Airborne Noise Equipment and Sound Levels

Construction Activity (a)	Construction Equipment (a)	Sound Level at 50 feet L_{eq} (dBA) (a)	Sound Level at 15 feet L_{eq} (dBA) (b)	Sound Level at 8 feet L_{eq} (dBA) (b)
Tunneling	Excavators, backhoes, haul trucks, loaders	84 to 86	94 to 96	100 to 102
Cut-and-Cover Station Construction	Excavators, backhoes, haul trucks, loaders, vibratory rollers	84 to 88	96 to 99	102 to 104

(a) Sound Transit WSBLE DEIS Appendix N.3, Table 6-8.

(b) Calculated using standard adjustment for distance from a point source: SPL2 = SPL1 + 20*Log(D1/D2).

L_{eq} = equivalent sound pressure level

WSBLE DEIS Appendix N.3 does not include a detailed assessment of noise from tunneling and cut-and-cover construction. Rather, WSBLE DEIS Appendix N.3, Chapter 6.2.3.2, p. 6-38 indicates that cut-and-cover construction of DT-1 "would likely result in airborne construction noise impacts at Northwest Rooms at Seattle Center, which house several noise-sensitive spaces including KEXP, the Vera Project, the SIFF Film Center, and the A/NT Art Gallery. The construction noise would also impact spaces in the north end of the Seattle Center including Seattle Repertory Theatre (Seattle Rep) and Cornish Playhouse."

As noted in Table 3, for alternative DT-1, airborne noise levels from tunneling and cut-and-cover station construction could reach up to 104 dBA at the building facade of KEXP. The SMC sound level limits for construction, as correctly noted in WSBLE DEIS Appendix N.3, Table 3-4 (p. 3-7), is 85 dBA for a commercial district noise source affecting a commercial district receiving property, with shorter-duration increases permitted for impact-type equipment. This limit would apply to noise received at KEXP from DT-1 construction. Predicted sound levels from construction therefore could well exceed City sound level limits at KEXP when equipment operates within approximately 50 feet of the building facade.

Noise reductions provided by the building envelope of KEXP (i.e., transmission loss, or "TL," provided by building construction materials) are not identified in the DEIS. Therefore, measurements were made at KEXP in February 2022 by Landau staff members to document interior/exterior reductions in noise provided by the building's north wall (i.e., TL). The findings suggest that the building provides approximately 61 dBA exterior-interior reduction in noise. Therefore, for sound levels at the exterior facade that are 104 dBA, interior levels from exterior construction equipment could be up to 43 dBA. As summarized below and in DEIS Appendix N.3, Chapter 6.3, the applicable sound level limits for noise-sensitive recording spaces within KEXP is 25 dBA. Noise from construction could reach up to 18 dBA over applicable interior sound level limits. The DEIS does not quantify the potential for impacts at interior recording spaces at KEXP; additional detail regarding mitigation measures is provided later in this report, in the section covering Chapter 6.4.2. Surface Construction Vibration Impacts.

Table 4 summarizes expected increases over ambient noise levels at rooms along the north facade of the KEXP facility. Increases are based on surface construction noise reaching 43 dBA inside the north facade of KEXP due to exterior noise levels that are up to 104 dBA; ambient noise levels are based on measurements made by Landau staff in December 2021 (see Figure 1). Reductions through the north wall facade of KEXP are based on Landau's measured exterior-interior reduction of 61 dBA.

Table 4. KEXP Surface Construction Airborne Noise Impacts (DT-1)

KEXP Room Along North Wall	Landau Ambient Noise Measurement (a)	DT-1 Construction Noise	
		Noise Level Inside North Facade of KEXP (dBA) (b)	Increase Over Existing Ambient Interior Level (dBA)
DJ 2	37	43	6
Audio Edit 2	30	43	13
Production 1	27	43	16
Production 2	27	43	16
Video Edit 2	24	43	19
Video Control Room	43	43	0

(a) Ambient measurements taken by Landau Associates staff on December 21, 2021. See Figure 1 (attached).
(b) Based on exterior sound level of 104 dBA and reduction of 61 dBA through KEXP north facade.

The Construction Noise – Multiple Years figure on p. 6 of the KEXP Presentation (Attachment 1) shows the potential noise impact to KEXP as a "heat map," highlighting potential impact from airborne construction noise during station construction for DT-1. As summarized in Table 4 and shown on the Construction Noise – Multiple Years figure on p. 6 of the KEXP Presentation (Attachment 1), airborne noise from construction is expected to be up to 19 dBA over existing ambient interior sound levels at KEXP along the north facade (at Video Edit 2), including up to 16 dBA over existing ambient levels at audio recording spaces, including Production 1 and Production 2. Actual increases may be higher or lower and will depend on the sound frequencies of exterior source of construction noise.

It is noted in WSBLE DEIS Appendix N.3, Chapter 6.2.3.2, p. 6-38 that "the loudest construction phase is expected to be near the beginning of construction during the cutting and removal of the existing street, which would likely include the use of impact equipment such as jackhammers or hoe rams." Landau notes that during other phases construction noise levels may be lower. Note that the ranges of sound levels provided in Table 4, and estimates of impacts provided in Table 5, are based on the FTA reference sound levels for excavators, backhoes, haul trucks, loaders, and vibratory rollers. Therefore, reference sound levels in Table 4 do not represent the loudest noises that could occur from use of jackhammers and hoe rams, and actual noise impacts during the initial phases are likely to be higher than is predicted in Table 4.

Landau finds that airborne noise impacts from DT-1 station construction, including during the initial phases of demolition work and during ongoing use of heavy machinery, is likely to adversely impact the use of these spaces.

Impact Noise

As indicated above, the loudest construction phase would likely include the use of impact equipment such as jackhammers or hoe rams. WSBLE DEIS Appendix N.3, Chapter 3.1.3 correctly summarizes the City construction criteria. Specifically, this section notes that impact noises, such as those noises generated by jackhammers and hoe rams, will be limited to the daytime hours of 8 a.m. to 5 p.m. weekdays and 9 a.m. to 5 p.m. weekends. The Final Environmental Impact Statement (FEIS) and subsequent construction management plans should include consideration of timing restrictions for these types of impact noises.

Northwest Courtyard

In addition to the above assessment of impact at interior recording spaces within KEXP, noise impacts from airborne construction may occur within the Northwest Courtyard, located between KEXP and the Climate Pledge Arena. The Northwest Courtyard is used as a public gathering space and is also expected to be used for KEXP live performances. Noise from surface construction propagating through the breezeway between KEXP and Vera Project may result in sound levels that impact the ability of KEXP to stage a live performance at the Northwest Courtyard.

Chapter 6.3: Operational Vibration Impacts

The operational vibration section of WSBLE DEIS Appendix N.3 includes predicted impacts from both vibration and groundborne noise during operation of the proposed WSBLE project. WSBLE DEIS Appendix N.3, Tables 6-13 (p. 6-51) and 6-14 (p. 6-53) identify operational groundborne noise and vibration impacts for DT-1 and DT-2, respectively.

The results in WSBLE DEIS Appendix N.3, Table 6-13 (and in WSBLE DEIS Appendix N.3, Attachment N.3H, Table 8-2) indicate that during operation of DT-1, KEXP would likely experience groundborne levels of up to 32 dBA at DJ2 and up to 35 dBA at the Mastering Suite. At DJ2 this level is a 7-dBA increase over the applicable limit; at the Mastering Suite this level is 10 dBA over the corrected limit of 25 dBA for a recording studio (see Table 1).

Landau finds that additional information and/or corrections are required to evaluate completely the potential for operational vibration and groundborne noise impacts to KEXP. The following summarizes these findings.

Groundborne Noise Limits

DEIS Appendix N.3, Table 6-13 (p. 6-51) and 6-14 (p. 6-53) identifies groundborne noise limits for KEXP. As indicated in these tables, a limit of 25 dBA applies to the KEXP DJ booth, and as documented

in Attachment N.3H, this limit also applies to the studio (live performance room) and audio edit room. As noted, the limit applied for the Mastering Suite (Production 1 and 2) is incorrectly listed at 30 dBA and should be 25 dBA, similar to other recording spaces and per FTA criteria.

Revised Assessment of Operational Groundborne Noise Impact

Landau conducted ambient measurements to further validate the limits established in the DEIS and evaluate further potential for operation noise impacts at spaces within KEXP (see Figure 1). Note that Landau also conducted ambient vibration measurements of these same spaces (see Figure 2). Included in Table 5 is a summary of the DEIS operational noise limits and results of measurements made within each space at KEXP. Also included for reference are measurements made in support of the DEIS, as documented in WSBLE DEIS Appendix N.3, Attachment N.3H, Table 8-1.

With the noted exception of the Mastering Suite (Production 1 and 2), the limits established in the DEIS are appropriate and highlight the need for mitigation of light rail operation. Note however that DEIS Appendix N.3, Tables 6-13 and 6-14, should include an expanded assessment to include a complete list of spaces within KEXP.

The final column of Table 5 below identifies the potential increase over existing ambient noise levels during operation of DT-1.

Table 5. KEXP Noise Limits, Ambient Noise Levels, and Operational Noise Levels

KEXP Room	Sound Level (dBA)				
	DEIS Noise Limit (a)	DEIS Ambient Measurement (b)	Landau Ambient Noise Measurement (c)	DEIS Operational Noise Level (d)	Increase over Ambient Levels (e)
DJ 1	25	-	38	26	0
DJ 2	25	33	37	32	0
Audio Edit 1	25	29	28	32	4
Audio Edit 2	25	-	30	32	2
Production A	30 (f)	-	27	35	8
Production B	30 (f)	-	27	35	8
Video Edit 1	30	-	25	32	7
Video Edit 2	30	-	24	32	8
Control Room	30	-	36	26	0
Live Room	25	28	28	26	0
Video Control Room	30	-	43	32	0

(a) Sound Transit WSBLE DEIS Appendix N.3, Attachment N.3H, Table 8-2. For DJ2, Audio Edit 1, Production 1, Video Edit 1 and 2, Control Room and Video Control Room, sound level limits are based on use of similar spaces within KEXP as defined in the DEIS.

(b) Ambient measurements summarized in Sound Transit WSBLE DEIS Appendix N.3, Attachment N.3H, Table 8-1.

(c) Ambient measurements taken by Landau staff on December 21, 2021. See Figure 1.

(d) Sound Transit WSBLE DEIS Appendix N.3, Attachment N.3H, Table 8-2. For DJ2, Audio Edit 1, Production A, Video Edit 1 and 2, Control Room and Video Control Room, predicted levels are based on impacts at spaces with similar setbacks within KEXP.

(e) Increase based on DEIS predicted noise levels over Landau-measured ambient noise levels.

(f) DEIS noise limit is incorrect for Production 1 and 2. Should be 25 dBA based on use as recording spaces.

To further illustrate the results in Table 5, the Ongoing Light Rail Operational Groundborne Noise figure on p. 8 of the KEXP Presentation (Attachment 1) provides a noise "heat map" that shows operational noise impacts by room within KEXP, based on predicted DEIS operational noise over ambient levels measured by Landau.

Train Speed

As summarized in DEIS Appendix N.3, Table 6-13 (p. 6-51) and 6-14 (p. 6-53) light rail train speeds were assessed as part of the calculation of groundborne noise and vibration. It is noted that there are inconsistencies or potentially errors that warrant further clarification.

For preferred alternative DT-1, the train speed through the Seattle Center campus is assumed to be 45 mph at all receivers except at KEXP, where speeds would be 55 mph and at the Seattle Rep and

Vera, where it would be 30 mph. The DEIS does not provide an explanation for the discrepancy in rail speeds. It understood that rail speeds would slow when trains were arriving at the station and would increase when trains were departing. However, at KEXP DJ2, the nearest section of rail is at the station itself, where trains would be driving at slow speeds or stopped, and would not likely be traveling 55 mph. Additional clarification and analysis is needed to ensure that train speed calculations are correct, and that resulting operational groundborne noise impacts from rail operation are correct.

For the DT-2 alternative, the train speed through the Seattle Center campus is 45 mph at all receivers except at the KEXP DJ booth, where is identified at 30 mph. Although impacts are not expected at KEXP from DJ2, the discrepancy in train speeds suggests that additional analysis may be warranted to ensure that the effect of rail speed has been adequately addressed.

Chapter 6.4: Construction Vibration Impacts

WSBLE DEIS Appendix N.3, Table 6-25 (p. 6-65) summarizes vibration impacts from construction. Table 6-25 identifies a predicted supply train vibration level of 69 vibration decibels (VdB) at KEXP, with a limit of 64 VdB, an exceedance of vibration thresholds at KEXP by 4 VdB. Further, predicted vibration from operation of the supply train and cutterhead (69 VdB and 60 VdB, respectively) would exceed ambient vibration levels at each space within KEXP (see ambient vibration measurements made by Landau in Figure 2).

WSBLE DEIS Appendix N.3, Table 6-27 predicts groundborne noise impacts at KEXP during tunneling, both with the cutterhead and supply train. Predicted groundborne noise levels would reach 42 dBA with the supply train and 38 dBA during use of the cutterhead, representing increases over the 25-dBA groundborne noise limit of 17-dBA and 13-dBA, respectively.

Table 8 below summarizes predicted tunneling groundborne noise emissions at each space within KEXP and compares these predictions with existing ambient conditions, as documented by Landau through noise measurements that were made in December 2021.

Table 6. KEXP Tunneling Groundborne Noise Increases of Existing Ambient Noise Levels, DT-1

KEXP Room	Landau Ambient Noise Measurement (a)	DT-1 Tunneling – Cutterhead		DT-1 Tunneling – Supply Train	
		Noise Level (dBA) (b)	Increase Over Existing Ambient (dBA)	Noise Level (dBA) (b)	Increase Over Existing Ambient (dBA)
DJ 1	38	38	0	42	4
DJ 2	37	38	1	42	5
Audio Edit 1	28	38	10	42	14
Audio Edit 2	30	38	8	42	12
Production 1	27	38	11	42	15
Production 2	27	38	11	42	15
Video Edit 1	25	38	13	42	17
Video Edit 2	24	38	14	42	18
Control Room	36	38	2	42	6
Live Room	28	38	10	42	14
Video Control Room	43	38	0	42	0

(a) Ambient measurements taken by Landau staff on December 21, 2021. See Figure 1.

(b) Sound Transit WSBLE DEIS Appendix N.3, Table 6-27.

As summarized in Table 6, predicted groundborne noise levels from tunneling, including from the cutterhead and supply train, were compared to existing ambient sound levels. The results suggest high levels of impact at most spaces within KEXP for DT-1. The biggest impacts to KEXP recording spaces are at Production 1 and 2, where groundborne tunneling noise is predicted to be up to 11 dBA over ambient conditions during construction with the cutterhead, and 15 dBA over ambient conditions during use of the supply train. Similar increases would occur at Audio Edit 1. Increases at this level would be clearly audible and discernible and may inhibit use of KEXP's audio recording facilities with low-frequency "rumbling" noise.

Mitigation is addressed later in this letter report, including the effectiveness of rubber tires on supply train vehicles. However, it is worth noting here that mitigation of supply train vehicles is strongly recommended to minimize potential for impact to KEXP. That is, that rubber tires should be required for the supply trains during tunneling given the high levels of groundborne noise anticipated at KEXP and the long duration of tunneling activity (multiple years).

To further illustrate the results in Table 6, the Tunneling Groundborne Noise figure on p. 7 of the KEXP Presentation (Attachment 1) provides a noise "heat map" that shows tunneling groundborne noise

impacts by room within KEXP, based on predicted DEIS operational noise over ambient levels measured by Landau.

Tunneling Equipment

WSBLE DEIS Appendix N.3, Section 6.4.1.2 and Table 6-26 (p. 6-66) identify equipment that would generate the highest levels of vibration during tunneling, including the boring machine cutterhead, thrust-jack retraction, and supply trains with steel wheels and jointed tracks.

In the footnote of Table 6-27 (p. 6-67), the WSBLE DEIS states, "The predicted levels for the thrust-jack are more than 5 dB below the impact threshold for all sensitive receivers." Groundborne noise predictions for thrust jack retraction are not provided in the WSBLE DEIS. However, Table 6-26 (p. 6-66) provides a range of sound levels of 13 to 29 dBA, as measured between 0 and 200 feet from thrust-jack operation. The range in sound levels for supply trains with steel wheels and jointed tracks is 24 to 28 dBA. While the median level of groundborne noise for supply trains is clearly higher than for thrust jack retraction, there is a potential for thrust jack retraction to generate groundborne noise levels that are as high as supply trains, according to the data provided in Table 6-26. The potential for groundborne noise impact is further increased when the limits for KEXP are adjusted (i.e., lowered).

A more detailed assessment should be conducted that further evaluates the potential for groundborne noise and vibration impact from thrust jack retraction.

Chapter 6.4.2. Surface Construction Vibration Impacts

WSBLE DEIS Appendix N.3, Table 6-29, p. 6-70, identifies distances for impact to Special Buildings during surface construction. The minimum distance for the least sensitive spaces (i.e., Vibration Criteria A, or V.C.-A) is greater than would be realized at KEXP for the equipment identified in this table. For example, the minimum distance for potential impact from a bulldozer under the V.C.-A curve is 125 feet, and the nearest distance to Special Buildings located near surface construction areas (i.e., KEXP) is 8 feet, as documented in Table 6-29.

WSBLE DEIS Appendix N.3, Chapter 6.4.2.2, p. 6-70 states that "surface construction vibration has not been assessed for Category 1 or special-use buildings near tunnel alignments. However, vibration from surface construction may be of concern if these buildings are close to the tunnel portals or station construction. These activities should be assessed in the Construction Vibration Control Plan."

Given the degree of impact that may occur from surface vibration during construction (see WSBLE DEIS Appendix N.3, Tables 6-29 and 6-30) and given the need to understand if effective mitigation of these impacts is feasible, a more detailed assessment of potential impacts and proposed mitigation should be included in a supplemental DEIS study, in lieu of requiring future assessments only through a control plan. Specifically, for cut-and-cover station excavation, in addition to the potential for usage impacts to tenants of the Northwest Rooms, an additional assessment should be completed that evaluates the potential for structural damage to the KEXP building.

Slurry Wall Demolition

The south wall of the DT-1 station design includes a diagonal portion that would extend underneath the Northwest Rooms, including underneath most of northern side of the KEXP building. A profile view of the station is provided on WSBLE DEIS Appendix J, Drawing B11-ASX102. Landau understands, through ongoing workshops hosted by Sound Transit during the WSBLE DEIS review period, that the southern wall of the DT-1 station would be constructed first as a vertical slurry wall, and then widened below grade toward the south to provide sufficient width for a station platform. Further, Landau understands that construction methods to expand the station footprint include breaking large portions of the slurry wall with a hoe ram. An illustration of how this construction activity may occur is provided in figures from the KEXP Presentation [Section A – Slurry Wall Demo (p. 4) and Perspective – Slurry Wall Demo (p. 5); Attachment 1].

The WSBLE DEIS does not include a review of impacts that are specific to the breaking of the slurry wall. However, demolition of this wall would occur very near Seattle Center resident organizations, including KEXP. It is anticipated that high levels of vibration would be emitted during use of the hoe ram, and impacts from this activity were not considered or included in the DEIS. Given the likely lengthy construction schedule (up to a year or more), there is a high potential for substantial impacts to KEXP during this phase of construction.

In addition to the use of a hoe ram, excavation of materials behind the slurry wall and directly underneath KEXP may result in additional vibration and groundborne noise impacts to multiple spaces within this facility.

Chapter 7: Noise and Vibration Mitigation Measures

Chapter 7.2: Construction Noise Mitigation

DEIS Appendix N.3, Chapter 7.2 (p. 7-16) identifies standard mitigation measures for construction noise. The following summarizes mitigation measures that were not included but should be considered:

General Construction Equipment

Loud construction equipment operating within the cut-and-cover construction area could operate as near as 8 feet from the KEXP building. As summarized above, estimated sound levels at the KEXP building could reach 104 dBA, and accounting for measured 61 dBA transmission loss through the building, could reach up to 43 dBA at interior spaces, potentially impacting recording operations within KEXP.

Mitigation measures summarized in the DEIS are effective strategies to reduce construction noise but do not specifically target the KEXP building and the potential for impacts therein.

Mitigation measures could include administrative controls, scheduling the noisiest activities during times that would be less likely to interfere with KEXP operations, including interior operations and outdoor performances within the Northwest Plaza. In addition, a noise barrier should be installed along the north wall of KEXP to provide additional shielding from construction equipment. A well-placed barrier of sufficient density (mass) and tall enough to break line-of-sight between the KEXP building and Northwest Plaza and construction equipment, could be effective at reducing noise emissions by 5 to 10 dBA or more. While this would not remove entirely the potential for impact at KEXP, it could reduce the degree of impact, especially if implemented in conjunction with other mitigation measures. Noise barriers should be required as part of the project's Construction Noise Control Plan.

Tunnel Ventilation Fans

Ventilation fans will be required to provide fresh air to crew within the tunnel and could operate 24-hours per day. The location of the fans is not yet defined but could be located very near to KEXP, including adjacent to the north wall, near noise-sensitive recording spaces. Due to the low-frequency noise generated by such fans, mitigation may be required to ensure fan noise at KEXP does not result in impacts to interior recording spaces or during outdoor performances at the Northwest Plaza.

Potential mitigation measures could include quieter fan models, strategic placement of fans, silencers, barriers, or other measures. Further, the EIS should include specific language within the Construction Noise Control Plan regarding exhaust fan noise.

Haul Trucks

Noise from idling and movement of haul trucks during construction, as well as noises from driving over uneven or unsecured surfaces, may result in impacts at noise-sensitive recording spaces within KEXP. Haul truck routes are not yet defined; however, an assessment should be completed to determine if mitigation of noise from haul trucks is warranted.

Further, the FEIS should include specific language within the Construction Noise and Vibration Control Plan regarding permitted haul routes that minimize the potential for impact to KEXP.

Staging Areas

Mitigation of staging area noise should be included in an updated noise impact assessment. Mitigation measures could include the strategic location of staging areas to minimize noise impacts, noise barriers, and other measures as defined in WSBLE DEIS Appendix N.3, Chapter 7.

Chapter 7.3: Operational Vibration Mitigation

Operational groundborne noise impacts are predicted at KEXP to be 32 dBA, 7 dBA over the limit at noise-sensitive recording spaces (see DEIS Appendix N.3, Attachment N.3H, Table 8-2, p. 8-21). DEIS Appendix N.3, Chapter 7.3.2.2 (p. 7-26) provides DT-1 operational groundborne noise and vibration

mitigation measures that would mitigate impacts at "recording studios and performances spaces in Seattle Center" (Chapter 7.3.2.2., p. 7-26). Included are high-resilience fasteners along 900 feet of new track between construction alignment stations 79+00 and 88+00.

The FTA 2018 Design Manual, in Table 6-11 (p. 140) states that high-resilience fasteners can achieve 5 dB of reduction in groundborne noise from tracks at frequencies above 40 hertz(Hz). As stated in DEIS Appendix N.3, Attachment N.3H, Chapter 8.4, p. 8-20, "Because Sound Transit expects at least 5 decibels of reduction from the tunnel structure that is not included in the prediction model, no additional mitigation measures beyond high-resilience fasteners are proposed."

If the above-noted Sound Transit expectation is true, groundborne noise impacts from tunnel operation would be mitigated. However, without additional predictive modeling to confirm, there is not clear evidence provided in the DEIS that supports Sound Tpreransit's position. Quantitative assessment of proposed mitigation suggests that groundborne noise impacts would likely occur at KEXP even with high-resilience fasteners. Therefore, additional assessment is needed to confirm that operational groundborne noise impacts would not occur at KEXP with the use of high-resilience fasteners and additional mitigation provided by the tunnel structure.

Chapter 7.4: Construction Vibration Mitigation

Chapter 7.4.1: Potential Surface Construction Vibration Mitigation

DEIS Appendix N.3, Chapter 7.4.1 (p. 7-31) identifies surface vibration mitigation measures that include pre-construction surveys, construction timing, equipment locations, continuous vibration monitoring, and alternative construction methods. The following summarizes mitigation measures that are not included.

Construction Vibration Control Plan

As noted in Chapter 6.4.2.2 (p. 6-70) of the WSBLE DEIS Appendix N.3, "surface construction vibration has not been assessed for Category 1 or special-use buildings near tunnel alignments, However, vibration from surface construction may be of concern if these buildings are close to the tunnel portals or station construction. These activities should be assessed in the Construction Vibration Control Plan."

Construction vibration measures should be updated once a more detailed assessment of surface vibration measures is completed, to support a Construction Vibration Control Plan. Given the high potential for surface vibration impact during construction, mitigation of surface vibration will be critical to KEXP.

Slurry Wall Demolition

As indicated, the DEIS does not include detailed assessment of the potential for vibration impacts from demolition of the slurry wall underneath KEXP. It is expected that both vibration and

groundborne noise impacts would occur at KEXP as a result of the slurry wall demolition, and therefore mitigation measures should be clearly evaluated and provided in the Construction Vibration Control Plan.

Chapter 7.4.2: Potential Tunneling Vibration Mitigation

DEIS Appendix N.3, Chapter 7.4.2 (p. 7-32) identifies mitigation measures to reduce the potential for vibration and groundborne noise impact during tunneling. The following summarize key elements of this review.

Supply Train

Details provided in WSBLE DEIS Appendix N.3, Chapter 7.4.2 are focused on mitigating vibration from the supply train, including reduced supply train speeds, smooth running surfaces, reduced gaps between rail sections, adding rubber pads between ties, and using rubber tires on supply trains. Specifically, WSBLE DEIS Appendix N.3, Chapter 7.4.2, p. 7-32 suggests that rubber tires on supply trains could provide effective mitigation of vibration and groundborne noise at frequencies above 10 Hz.

As noted in WSBLE DEIS Appendix N.3, Table 6-27 (p. 6-67), groundborne noise from unmitigated supply trains could result in noise levels inside KEXP that are up to 42 dBA, exceeding the 25-dBA recording studio noise limit by 17 dBA. Mitigation of noise from supply trains in the vicinity of KEXP is warranted.

Given the high level of impact that may occur due to the supply trains at multiple noise-sensitive Seattle Center facilities and resident organizations, and that predictive modeling has not been completed to fully evaluate the mitigating effect of rubber tires on supply trains, the Construction Vibration Control Plan should be supported by a detailed assessment of rubber tires on supply trains, including an assessment of impacts and mitigation effectiveness at KEXP. The assessment should evaluate whether impacts to each of the spaces within KEXP are effectively mitigated to below ambient levels.

Thrust Jack

As indicated, mitigation of vibration from thrust jacks may be warranted through slower retraction of the jacks. A mitigation assessment of thrust jacks should be completed once a more detailed assessment of the potential for impact from this activity is completed. If necessary, mitigation measures should be included in the Construction Vibration Control Plan.

Cutterhead

As stated in WSBLE DEIS Appendix N.3, Chapter 7.4.2, p. 7-32, it is not possible to mitigate vibration from the tunneling cutterhead. However, as stated, mitigation can be achieved through vibration monitoring and coordination with Category 1 and special use buildings (i.e., KEXP). The Construction

Vibration Control Plan should specify locations to be monitored at KEXP, including the number of monitors and duration of monitoring, as well as the established thresholds above which action is taken. Also, the Plan should include clear direction for the General Contractor to coordinate with KEXP so that noise-sensitive events can be schedule accordingly.

* * * * *

If you have you any questions or comments regarding the information provided in this letter report, please contact the undersigned.

LANDAU ASSOCIATES, INC.

Kevin Warner
Principal

Kristen Wallace
Principal

References

FTA. 2018. Transit Noise and Vibration Impact Assessment Manual. FTA Report No. 0123. Federal Transit Administration. September. https://www7.fta.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

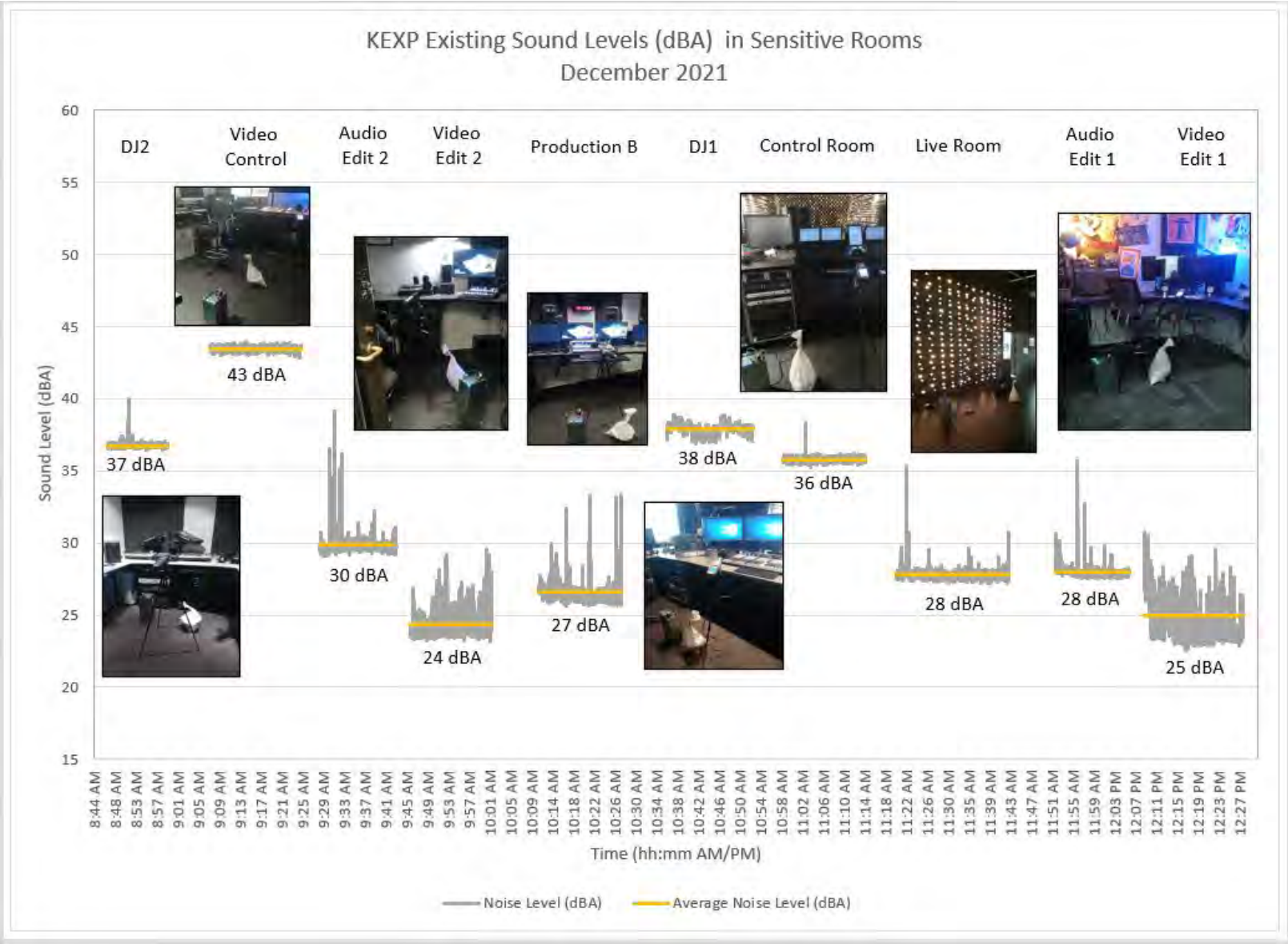
Sound Transit. 2021. Design Criteria Manual. Amendment 11 Revision 5. May. https://www.soundtransit.org/sites/default/files/documents/design-criteria-manual-may-2021.pdf.

USDOT, FTA, and Sound Transit. 2022a. West Seattle and Ballard Link Extensions Draft Environmental Impact Statement. US Department of Transportation, Federal Transit Administration, and Central Puget Sound Regional Transit Authority (Sound Transit). January. https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-ballard-link-extensions-draft-environmental-impact-0.

USDOT, FTA, and Sound Transit. 2022b. West Seattle and Ballard Link Extensions Draft Environmental Impact Statement, Appendix N.3: Noise and Vibration Technical Report. US Department of Transportation, Federal Transit Administration, and Central Puget Sound Regional Transit Authority (Sound Transit). January. https://www.soundtransit.org/sites/default/files/documents/16a-wsble-drafteis-noisetechreport-202201.pdf.

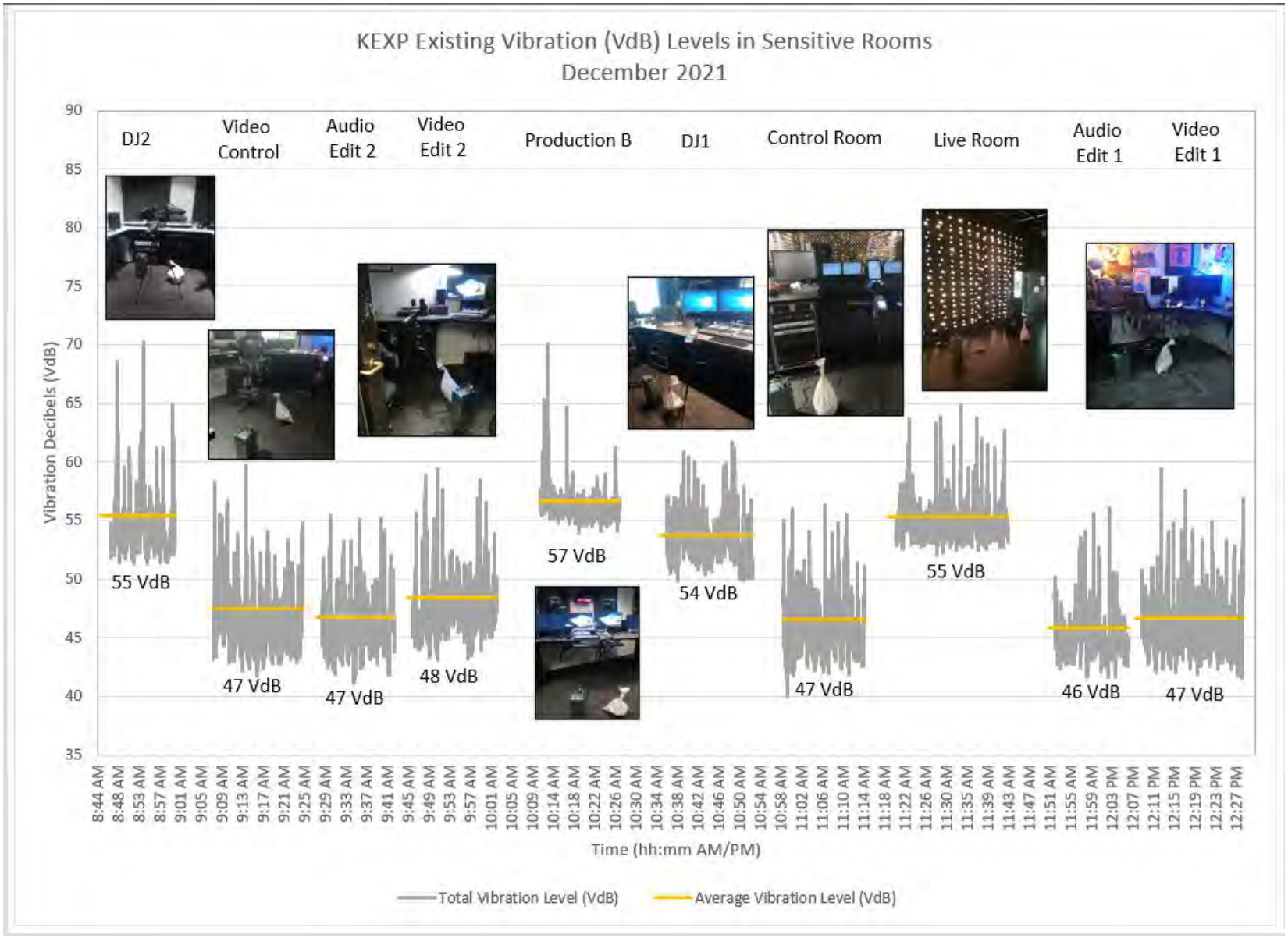
Attachments

Figure 1: Chart of Landau Ambient Noise Measurements at KEXP
Figure 2: Chart of Landau Ambient Vibration Measurements at KEXP
Attachment 1: KEXP Sound Transit Construction Impact, April 26, 2022



Sound Transit WSBLE DEIS KEXP Seattle, Washington	**Chart of Landau Ambient Noise Measurements at KEXP**	Figure 1

LANDAU ASSOCIATES

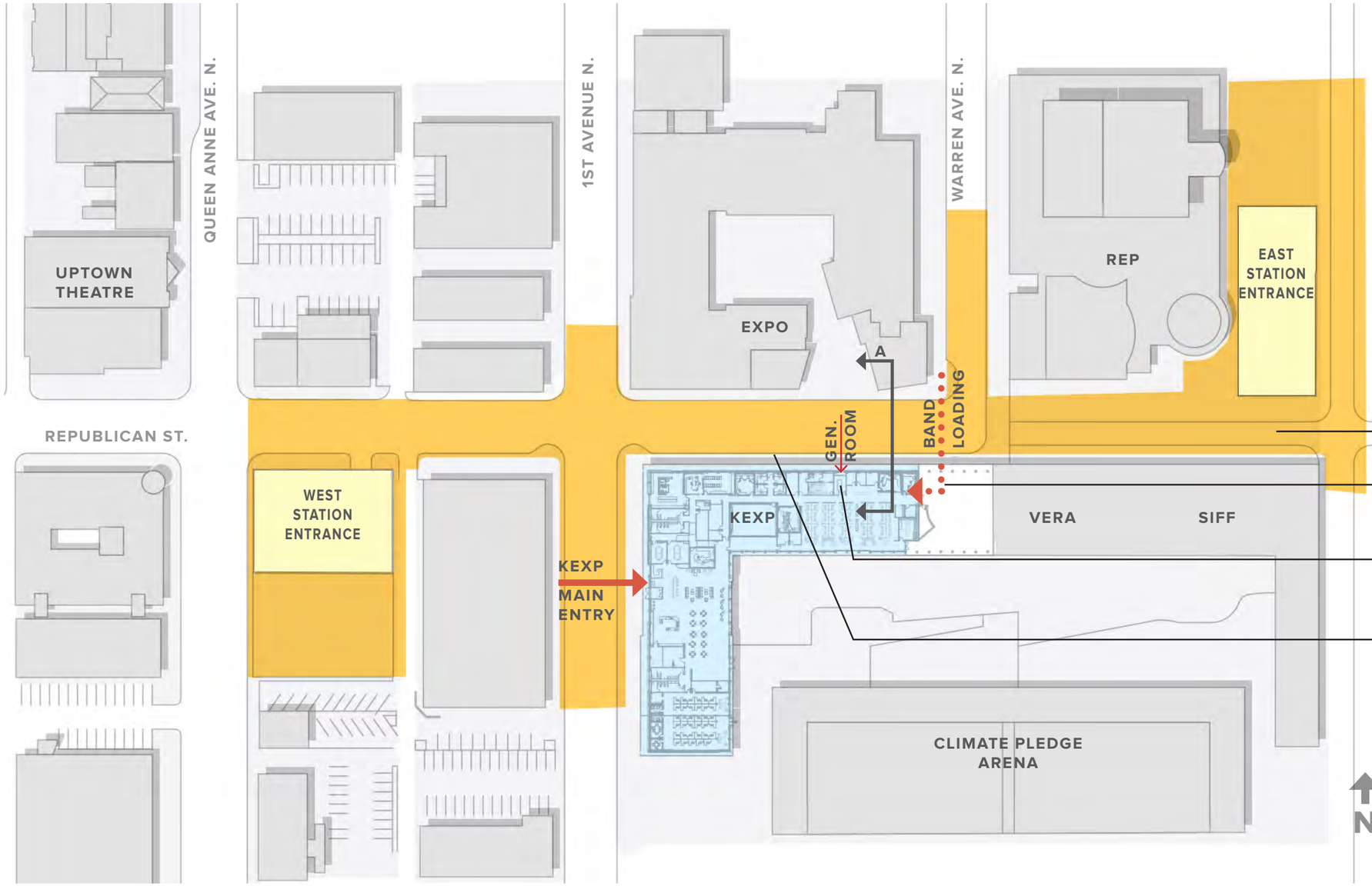


Sound Transit WSBLE DEIS KEXP Seattle, Washington	**Chart of Landau Ambient Vibration Measurements at KEXP**	Figure 2

LANDAU ASSOCIATES

Attachment 1

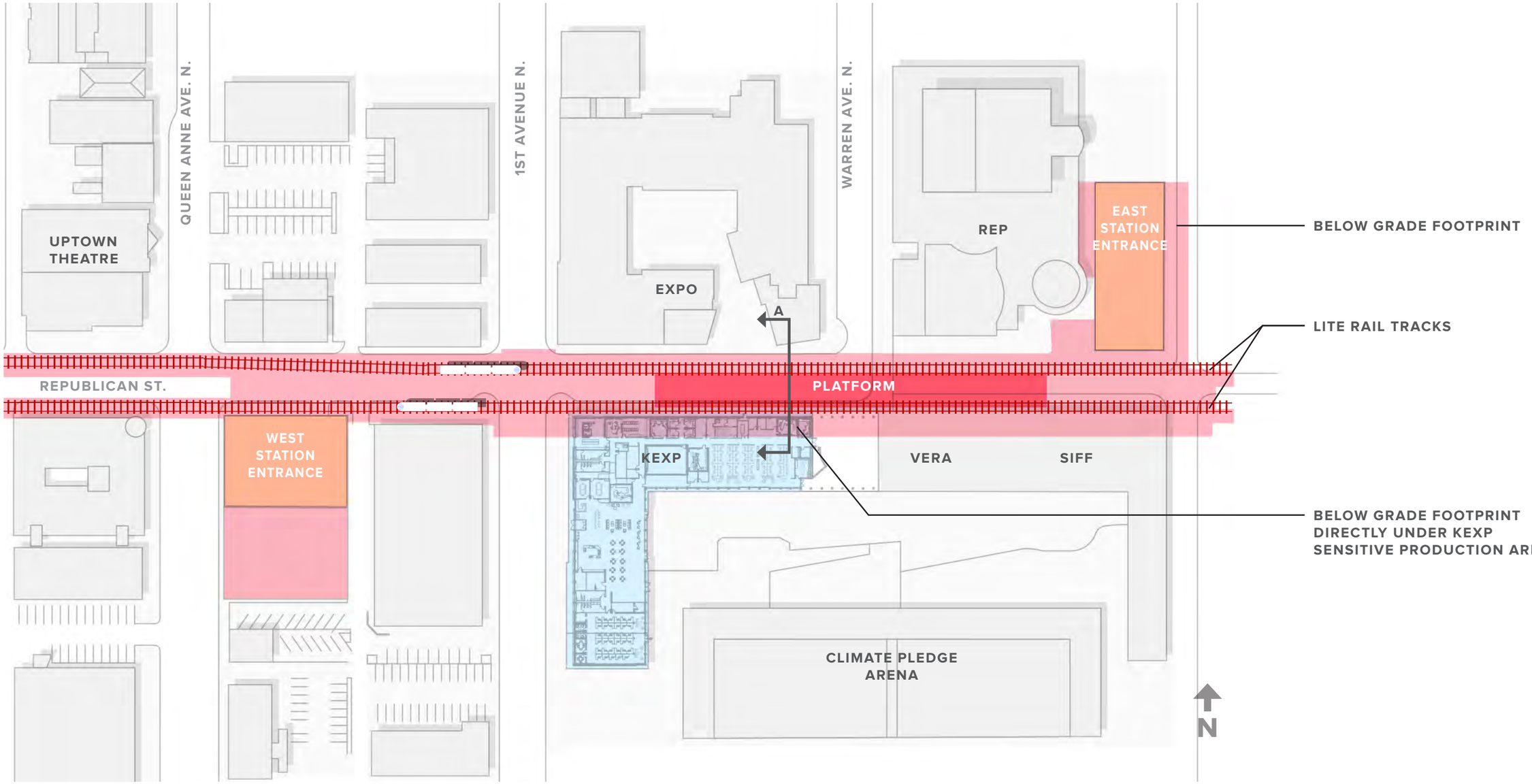
KEXP Sound Transit Construction Impact
April 26, 2022



CONSTRUCTION BARRIER EXAMPLE

CONSTRUCTION BARRIER EXAMPLE

STATION AREA CONSTRUCTION AND STAGING ZONE



STATION AREA BELOW GRADE

DISRUPTION STEPS

STEPS 1-4 CONSTRUCTION OF STATION ESTIMATED 2-4 YEARS

STEP 5 TUNNELING ESTIMATED 2-2.5 YEARS

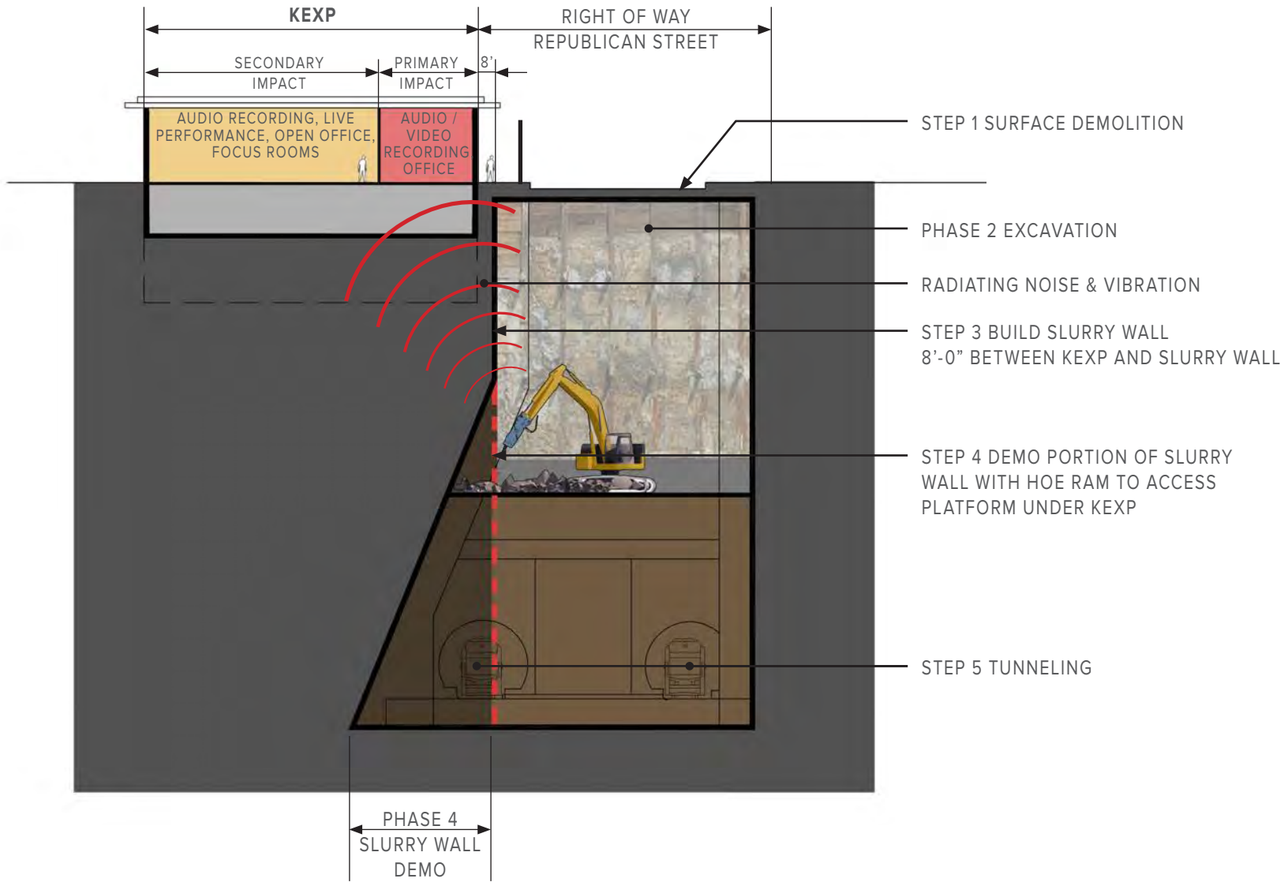
STEP 1: DEMOLITION

STEP 2: EXCAVATION

STEP 3: BUILD SLURRY WALL

STEP 4: DEMO PORTION OF SLURRY WALL BELOW KEXP

STEP 5: TUNNELING

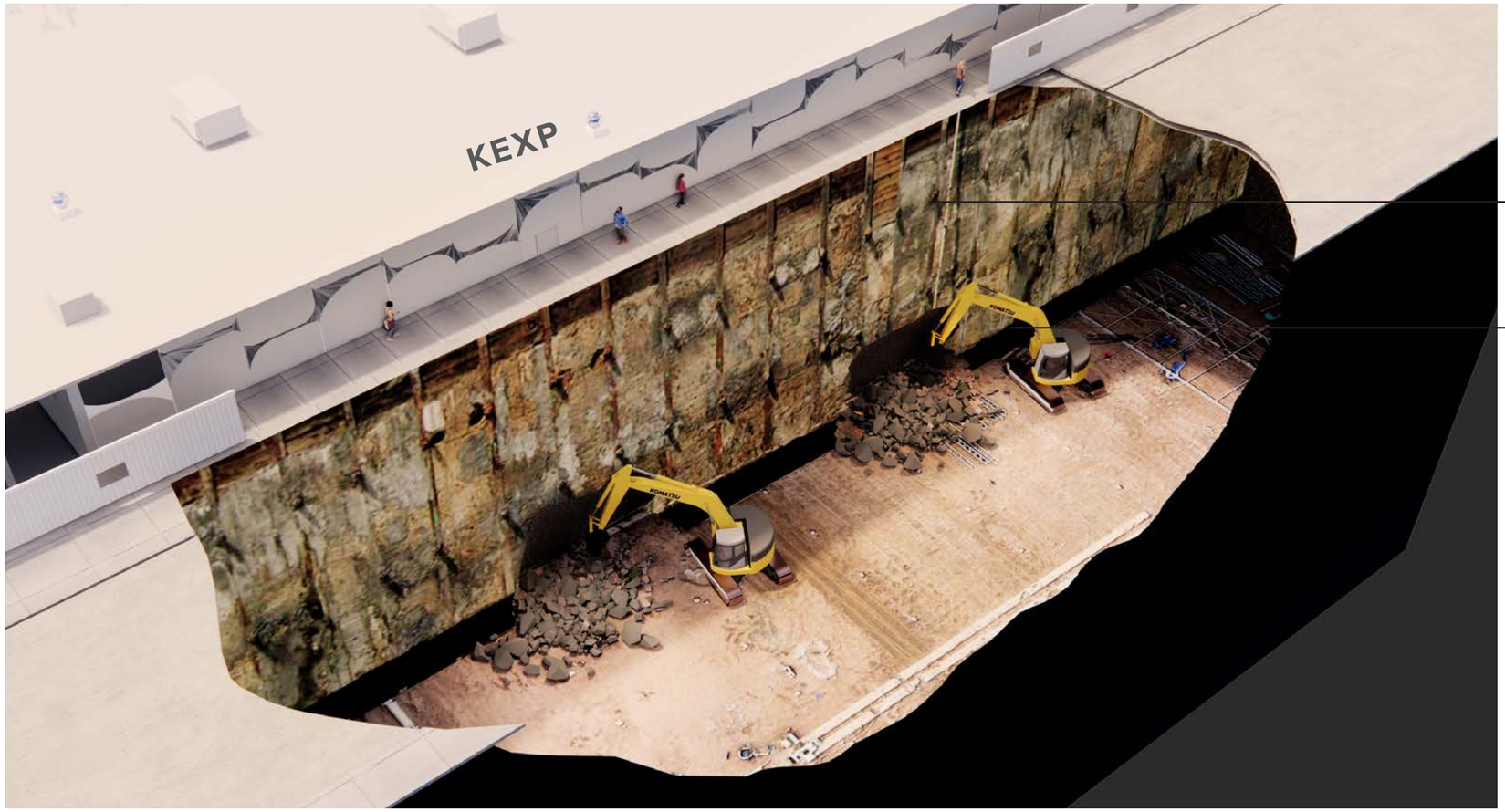


*CHAPTER 6.2.1.6 (6-33) NOTES WORST CASE NOISE LEVEL WILL BE 88 dBA AT 50' AWAY. KEXP IS 8' LOCATED FROM CONSTRUCTION AND AWAY AND ESTIMATED TO HAVE A NOISE LEVEL OF 104 dBA AT THE EXTERIOR OF KEXP.

SECTION A - SLURRY WALL DEMO

PHASE 4: DEMO PORTION OF SLURRY WALL BELOW KEXP

AFTER SLURRY WALL IS BUILT, DEMOLITION TO PORTION OF SLURRY WALL WILL OCCUR TO ACCESS AREA BELOW KEXP.



SLURRY WALL

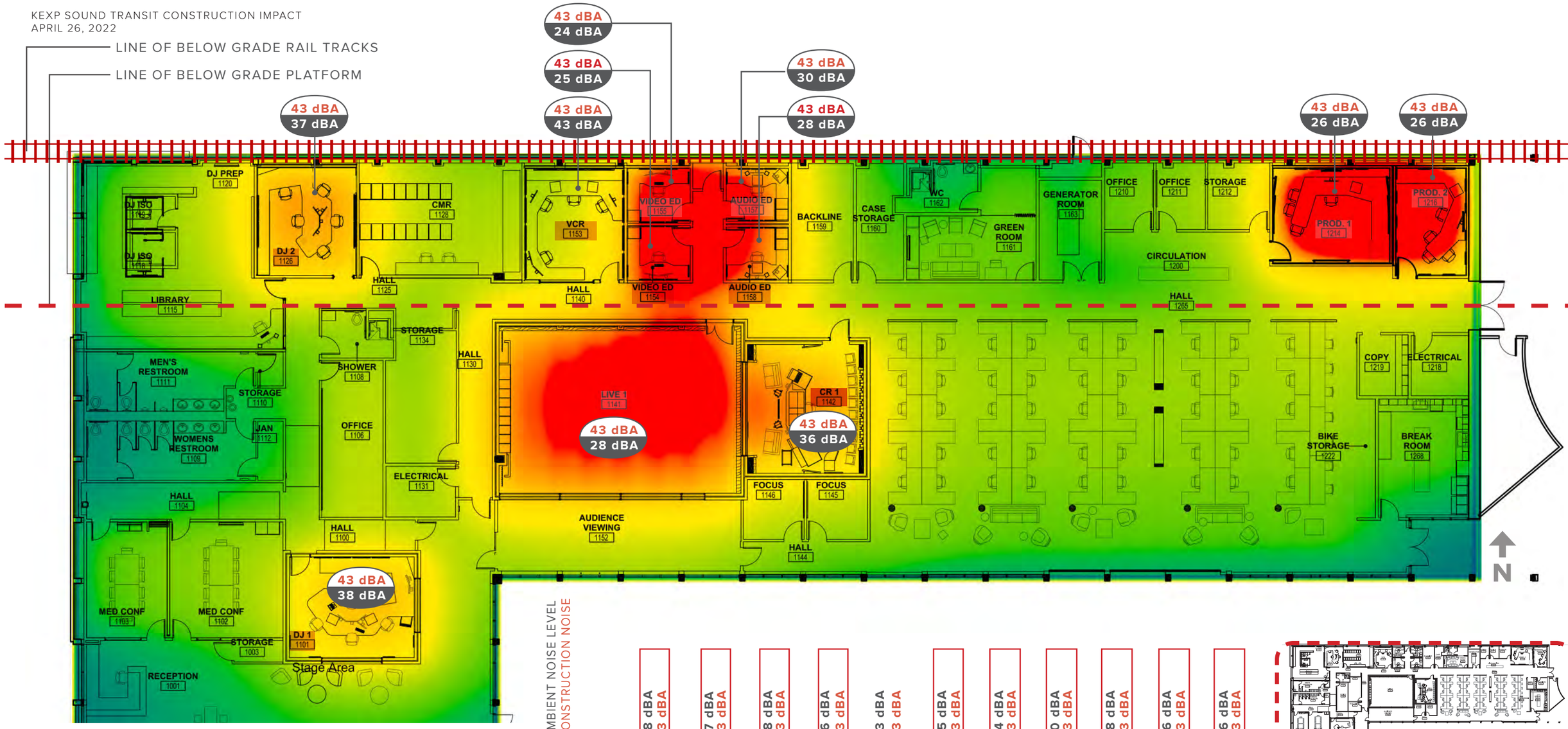
HOE RAM BREAKING THROUGH SLURRY EXPAND AND ACCOMMODATE WIDTH REQUIRED FOR PLATFORM

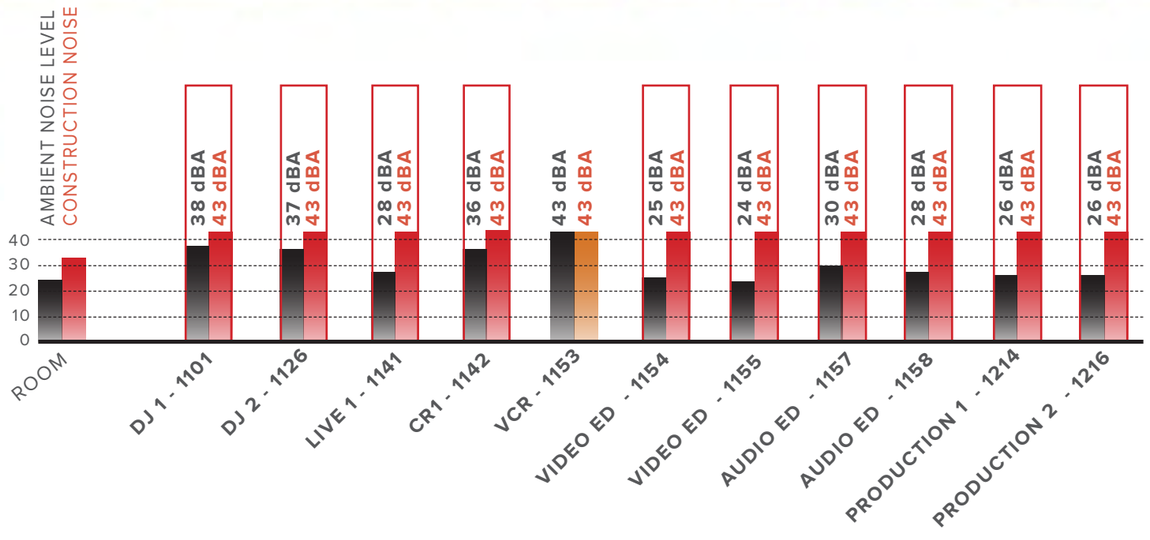
PERSPECTIVE - SLURRY WALL DEMO

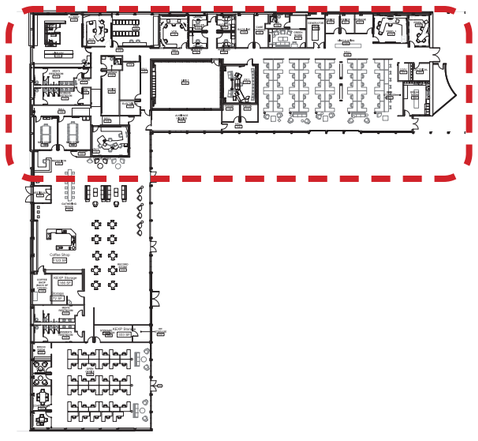
KEXP SOUND TRANSIT CONSTRUCTION IMPACT
APRIL 26, 2022

LINE OF BELOW GRADE RAIL TRACKS

LINE OF BELOW GRADE PLATFORM







KEY PLAN

32 dBA
25 dBA

PREDICTED GROUNDBORNE NOISE DURING CONSTRUCTION

AMBIENT NOISE LEVEL
Ambient noise numbers come from Landau's measurements in KEXP's space

LIVE 1
1141

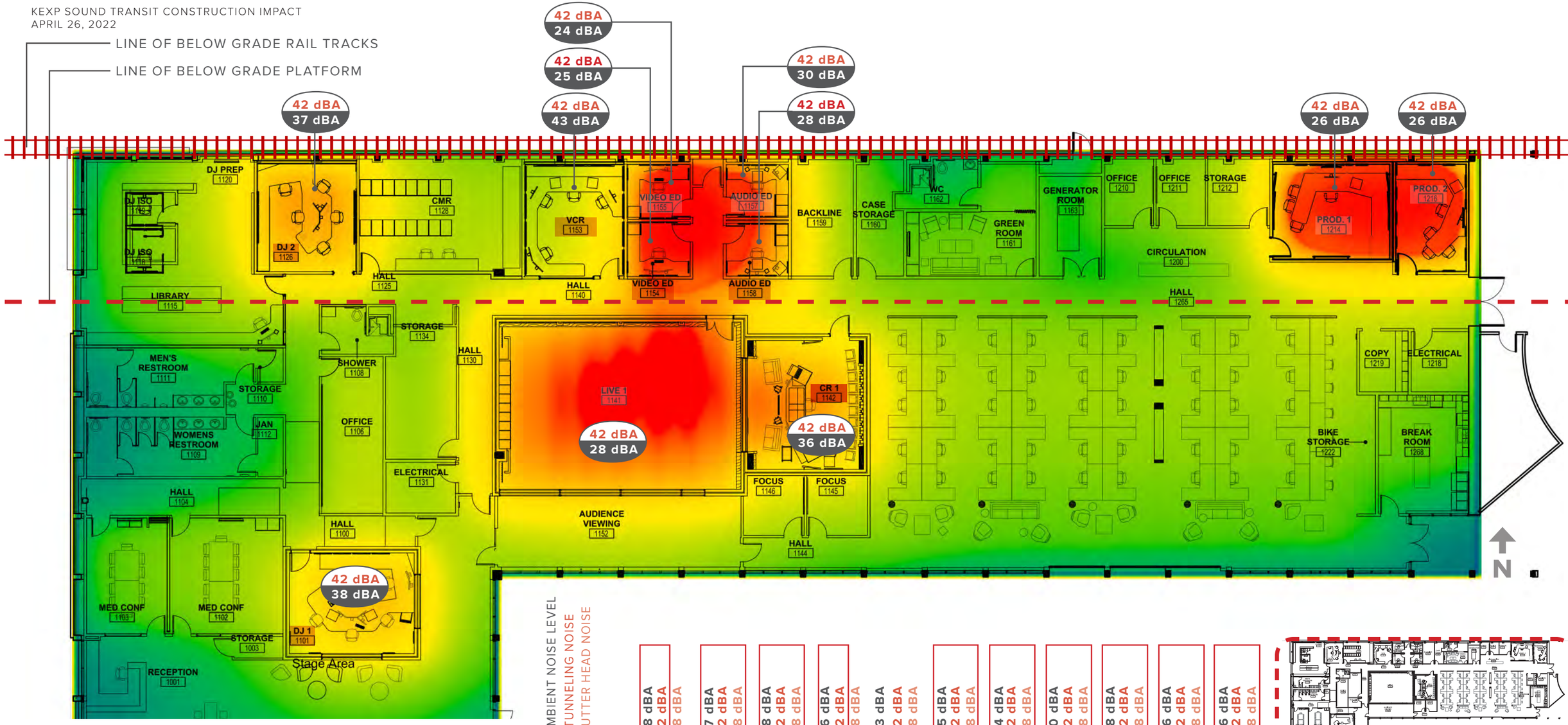
RECTANGLE DENOTES NOISE SENSITIVE SPACE

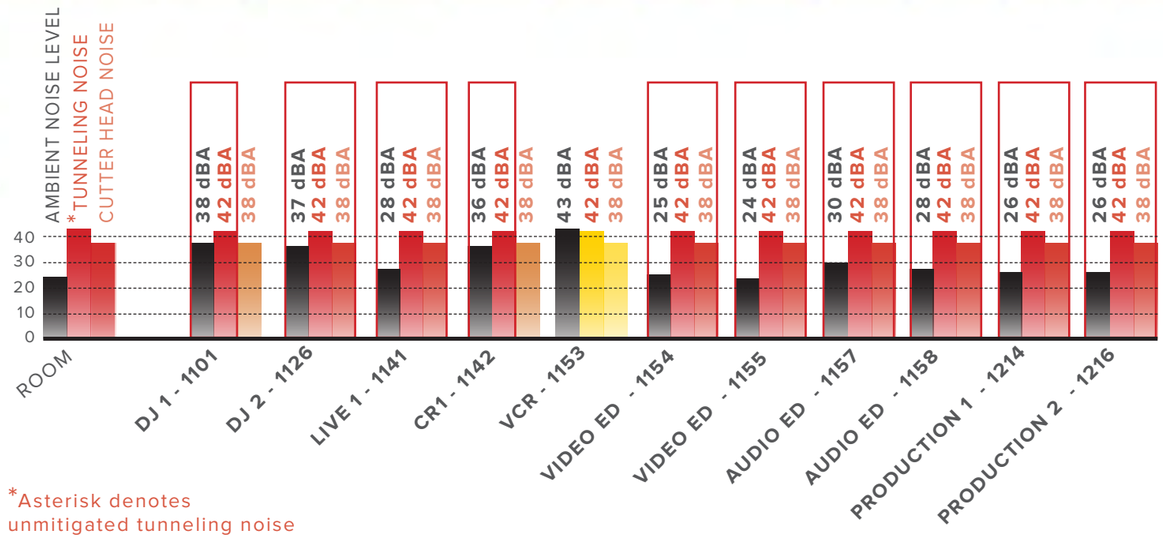
CONSTRUCTION NOISE - MULTIPLE YEARS

KEXP SOUND TRANSIT CONSTRUCTION IMPACT
APRIL 26, 2022

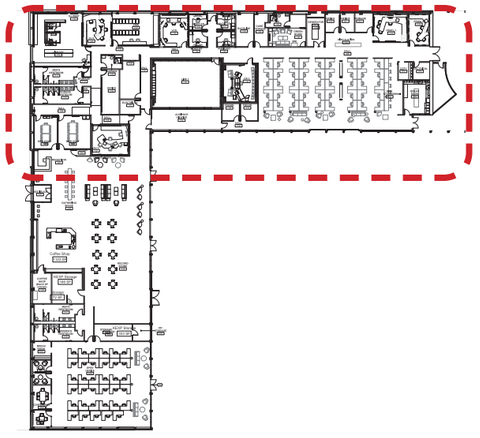
LINE OF BELOW GRADE RAIL TRACKS

LINE OF BELOW GRADE PLATFORM





*Asterisk denotes unmitigated tunneling noise



KEY PLAN

32 dBA
25 dBA

PREDICTED TUNNELING GROUNDBORNE NOISE
(CUTTER HEAD NOISE SHOWN ON GRAPH ONLY)

AMBIENT NOISE LEVEL
Ambient noise numbers come from Landau's measurements in KEXP's space

LIVE 1 1141

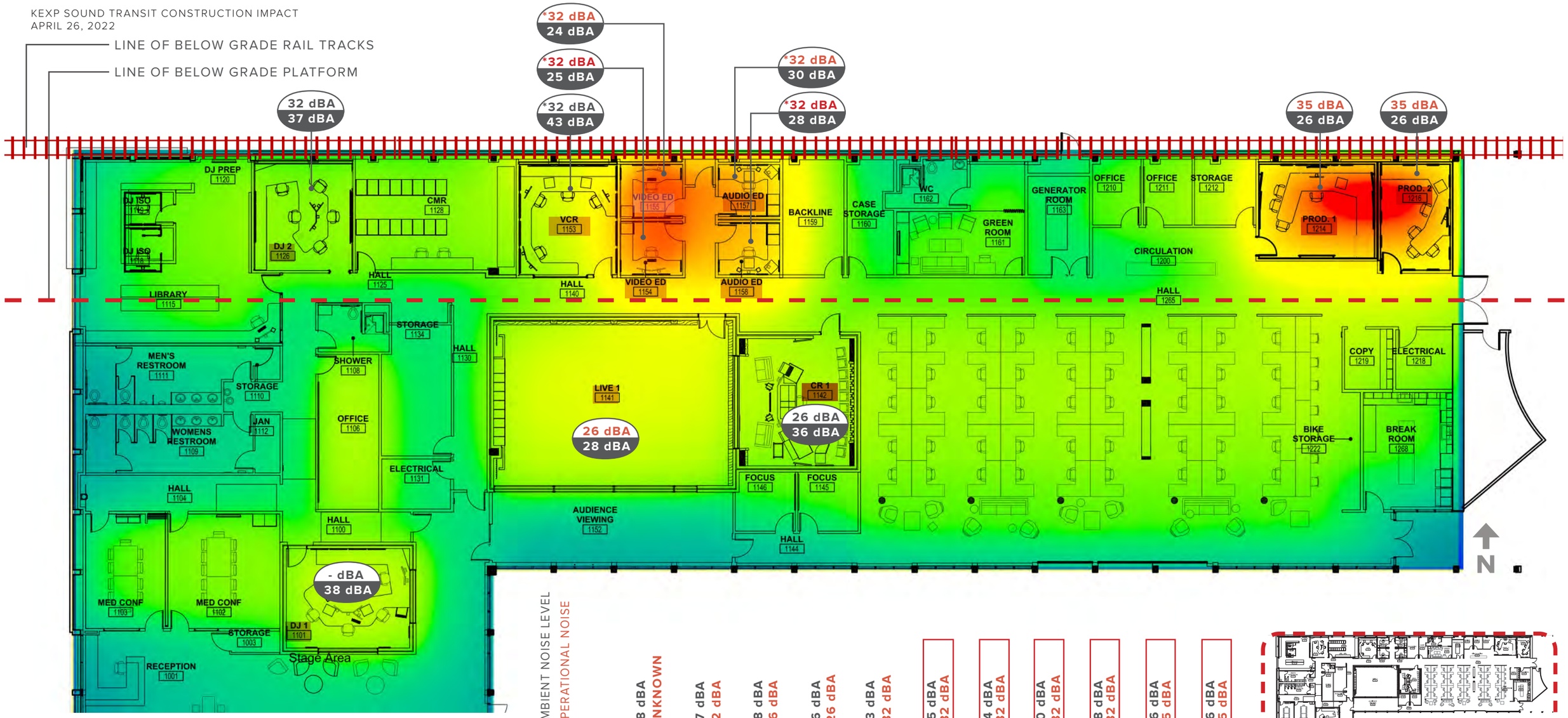
RECTANGLE DENOTES NOISE SENSITIVE SPACE

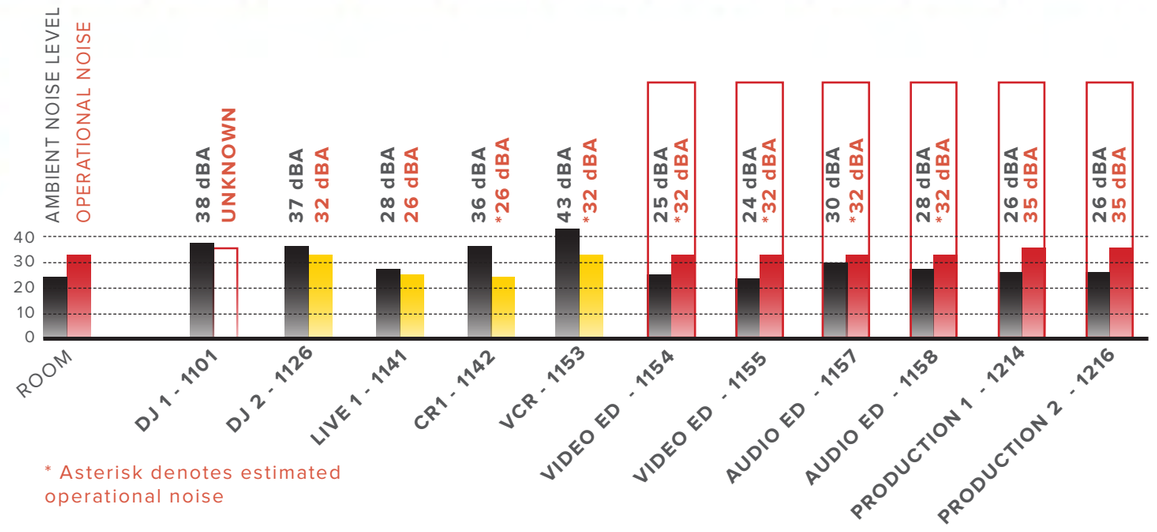
TUNNELING GROUNDBORNE NOISE

KEXP SOUND TRANSIT CONSTRUCTION IMPACT
APRIL 26, 2022

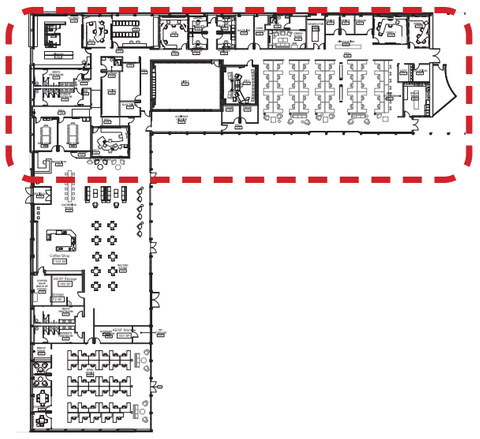
LINE OF BELOW GRADE RAIL TRACKS

LINE OF BELOW GRADE PLATFORM





* Asterisk denotes estimated operational noise



KEY PLAN

* ASTERISK WHERE OCCURS:
ASSUMED CONSTRUCTION NOISE
(INFO NOT PROVIDED BY CITY)

PREDICTED OPERATIONAL GROUNDBORNE LIGHT RAIL NOISE

*32 dBA
25 dBA

AMBIENT NOISE LEVEL
Ambient noise numbers come from Landau's measurements in KEXP's space

LIVE 1
1141

RECTANGLE DENOTES NOISE SENSITIVE SPACE

ONGOING LIGHT RAIL OPERATIONAL GROUNDBORNE NOISE

EXHIBIT B

April 26, 2022

Seattle Rep
P.O. Box 900923
155 Mercer Street
Seattle, WA 98109

Attn: Jeffrey Herrmann

Transmitted via email to: *jeff.herrmann@seattlerep.org*

Re: Sound Transit WSBLE DEIS Review for Seattle Repertory Theater
Seattle, Washington
Landau Project No. 2063001.010

Dear Jeff:

At the request of Seattle Repertory Theatre (Seattle Rep), Landau Associates, Inc. (Landau) prepared this summary of our assessment of the noise and vibration sections of the Sound Transit West Seattle and Ballard Link Extensions (WSBLE) Draft Environmental Impact Statement (DEIS).

Seattle Rep is located at Seattle Center and contains two main theaters: the 696-seat Bagley Wright Theater and the 282-seat Leo Kreielsheimer (Leo K.) Theater. Seattle Rep also houses additional rehearsal spaces, including the Poncho Forum (also used for performances) and the Leo K. Theater rehearsal space, set, prop, paint, and costume shops, administrative offices, and extensive lobby areas for the general public.

Seattle Rep has retained Landau noise and vibration expert consultants to review the WSBLE DEIS and provide comment on the document's accuracy and completeness regarding assessment of noise and vibration impacts.

This letter report summarizes Landau's assessment of the WSBLE DEIS as it relates to the potential for noise and vibration impact to Seattle Rep, and includes a summary of findings, a list of documents that were reviewed, and a detailed review of selected chapters of the DEIS.

Summary

Landau finds the assumptions and methods used by Sound Transit to analyze noise and vibration impacts to be reasonably correct. However, Landau finds some elements of the WSBLE DEIS analysis to be incomplete and/or incorrect. These missing or incorrect analysis elements result in an incomplete assessment of noise and vibration impacts and mitigation. The key findings of this review include:

- City of Seattle (City) noise limits are not applied in the noise impact section when determining the potential for construction noise impacts and whether additional mitigation is warranted.

- Edits to the document are required to adjust noise and vibration limits for sensitive spaces within Seattle Rep; these adjustments will result in higher levels of impact at some sensitive receivers.
- There are missing receptors, including the Leo K. Rehearsal space and the Poncho Forum, which are sensitive spaces within Seattle Rep.
- The assessment of airborne noise impacts during construction is incomplete.
- An assessment of mitigation measures is required for expected airborne noise impacts at Seattle Rep.
- Additional assessments of groundborne noise and vibration impacts from construction are warranted to fully address potential impacts from both Downtown-1 (DT-1) and DT-2.
- Additional assessments of groundborne noise and vibration mitigation measures from construction are warranted to fully address impacts from both DT-1 and DT-2.
- The surface construction vibration impact and mitigation assessment is incomplete.
- Station construction methods for DT-1 include breaking a slurry wall with a hoe ram, a potential major source of groundborne noise and vibration that was not evaluated.
- East Station Entrances would be located immediately adjacent to Seattle Rep; groundborne noise, vibration, and surface noise impacts from construction are not fully evaluated.
- Operational groundborne noise impacts warrant additional mitigation for DT-1 beyond high-resilience fasteners and beyond the linear extents identified in the DEIS.

Review Documents

Landau reviewed the following documents in support of the assessment:

- Sound Transit and Federal Transit Administration's (FTA's) WSBLE DEIS, Chapter 4.2.7: Noise and Vibration (pp. 4.2.7-1 to 4.2.7-23) (USDOT et al. 2022a)
- Sound Transit and FTA's WSBLE DEIS, Appendix N.3: Noise and Vibration Technical Report (USDOT et al. 2022b)
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3A: Noise Measurement Data, Site Details, and Photographs
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3B: Vibration Measurement Site Photographs
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3C: Vibration Propagation Measurement Results
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3D: Maps of Noise Impact Assessment
- Sound Transit and FTA's WSBLE, Attachment N.3E: Maps of Vibration Impact Assessment
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3F: Tables of Noise Predictions
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3G: Tables of Vibration Predictions
- Sound Transit and FTA's WSBLE DEIS, Attachment N.3H: Vibration Analysis of Category 1 Land Uses and Special Buildings

- FTA's *Transit Noise and Vibration Impact Assessment Manual* (FTA Guidance Manual; FTA 2018)
- Sound Transit's Design Criteria Manual, Revision 5, Amendment 11 (Sound Transit 2021).

Review Format

Landau's assessment focused on chapters in the WSBLE DEIS that are relevant to the assessment of noise and vibration impacts from DT-1 and DT-2. Headings that begin with "Chapter" refer to the corresponding chapter in WSBLE DEIS Appendix N.3: Noise and Vibration Technical Report (USDOT et al. 2022b).

Chapter 3: Noise and Vibration Impact Criteria

The WSBLE DEIS applies the noise and vibration impact criteria established for transit projects according to the FTA Guidance Manual. Sound Transit is a public transit authority that receives federal funding to support its projects. Landau finds that the use of the FTA criteria is appropriate for the assessment of noise and vibration impacts from this project. However, as detailed below, the FTA noise and vibration limits that were applied to some sensitive receiving spaces were incorrect.

WSBLE DEIS Appendix N.3, Chapter 3.1.3 identifies the City noise criteria, as established in Chapter 25.08 of the Seattle Municipal Code (SMC). SMC noise limits are applicable during daytime and nighttime hours for various source and receiving "Districts." Further, SMC 25.08 includes sound level limits that apply specifically to construction. Landau finds the DEIS interpretation of the City's noise criteria to be correct.

Landau finds that the assessment does not identify impacts relative to the City's noise criteria. That is, the assessment is focused only on FTA criteria (that are applicable) and whether construction or operation would meet FTA criteria. The assessment refers to the required compliance with City construction noise limits in WSBLE DEIS Appendix N.3, Chapter 7, Construction Noise Mitigation (p. 7-16), but not when evaluating the potential for noise impacts throughout Seattle Center. Because City construction noise limits apply to this project, the noise assessment should consider whether construction noise is expected to meet these limits. If the project cannot meet these limits, sufficient noise mitigation measures should be required; otherwise, alternative construction methods should be explored.

Chapter 4: Noise and Vibration Impact Analysis Assumptions and Methods

WSBLE DEIS Appendix N.3, Chapter 4 summarizes the analysis assumptions and the methods for assessment of noise and vibration impacts. This chapter reviews multiple elements that are considered when predicting noise and vibration emissions from light rail projects and includes results of vibration propagation testing and discusses noise and vibration measurements made by Sound

Transit to support the noise and vibration impact assessment. Landau finds the impact analysis assumptions and methods to be reasonably correct.

Chapter 6: Impact Assessment

The following summarizes Landau's review of the WSBLE DEIS impact assessment of DT-1 and DT-2, including airborne noise from construction and groundborne noise and vibration from construction and operation, as received at Seattle Rep. Figure 1, a map of Seattle Rep within the Seattle Center campus, illustrates the locations of DT-1 and DT-2, including rail alignments, stations, and station entrances, as well as nearby Seattle Center resident organizations, facilities, and outdoor areas.

Noise and Vibration Limits

WSBLE DEIS Appendix N.3, Chapter 6.4 (p. 6-63) indicates that noise and vibration from construction, including tunneling (cutterhead and supply train) and surface construction were compared to the same FTA operational noise limits "because this can be a relatively long-term activity." Landau agrees with this determination and notes that the noise limits in WSBLE DEIS Appendix N.3 contain errors and omissions for spaces within Seattle Rep. Table 1 summarizes the noise and vibration limits applied for each space, highlighting the errors that require correction or further assessment. The list of noise and vibration limits for Seattle Rep sensitive spaces was compiled from WSBLE DEIS Appendix N.3, Attachment N.3H, Tables 7-2 and 7-3.

Noise and Vibration Limits – Corrections

WSBLE DEIS Appendix N.3, Section 6.3, Tables 6-13 and 6-14 identify operational groundborne noise and vibration limits for DT-1 and DT-2, respectively. For Seattle Rep, the operational groundborne noise and vibration limits were expanded to consider different rooms within the facility as shown in Tables 7-2 and 7-3 in WSBLE DEIS Appendix N.3, Attachment N.3H. For example, in Table 6-13 Seattle Rep is identified as "Seattle Repertory Leo K. Theatre." In Attachment N.3H, Table 7-2, Seattle Rep spaces include the Leo K. and the Bagley Wright Theaters.

Landau notes that adjustments to some Seattle Rep noise limits, as documented in the DEIS, are warranted following measurements by Landau staff and review of the noise- and vibration-sensitive nature of selected spaces. That is, for many spaces within Seattle Rep, a quiet environment is germane to their use. Noise intrusion, such as low-frequency groundborne noise "rumbling" from nearby surface construction, tunneling, and rail operations, may negatively affect Seattle Rep's use and audience experience. Vibration impacts, even at low levels, can affect the stability of Seattle Rep's suspended lighting systems (i.e., vibrations may cause suspending lighting systems to sway).

A summary of the recommended adjustments to the groundborne noise and vibration limits, including a justification for the adjustment, is provided below in Table 1. Additional detail is provided in the text after this table. Graphical illustrations of noise and vibration measurements made at spaces within Seattle Rep are provided on Figures 2 and 3, respectively.

Table 1: Summary of Noise and Vibration Limit Corrections

Resident Organization	Limits for Operation and Construction (a)		Corrections (Source of Adjusted Limits) (b)		Notes Justification for Adjusted Limits
	Noise (dBA)	Vibration (VdB)	Noise (dBA)	Vibration (VdB)	
Seattle Rep Bagley Wright Theater	35	72	--	65 VdB	Vibration limit is appropriate for "Concert Hall" per FTA Guidance Manual. DEIS noise limit appropriate, confirmed through DEIS and Landau measurements
Seattle Rep Leo K. Theater	35	72	25 dBA	65 VdB	Noise and vibration limits are appropriate for "Concert Hall" per FTA Guidance Manual, confirmed through Landau measurements

(a) Sound Transit WSBLE DEIS Appendix N.3, Attachment N.3H, Tables 7-2 and 7-3.

(b) Based on measurements made by Landau staff for Seattle Rep in early 2022.

dBA = A-weighted decibels

VdB = vibration decibels

Measurements at the Leo K. Theater by Landau staff in January 2022 suggest that a more appropriate limit is 25 dBA, aligning with FTA criteria for a "Concert Hall." Although the measurement made for the DEIS and documented in WSBLE DEIS Appendix N.3, Attachment N.3H, Table 7-1 (p. 7-3) was 30 dBA for the Leo K. Theater (which is still 5 dBA lower than what was applied in Tables 6-13 and 6-14), the average ambient measurement by Landau was 26 dBA (see Figure 5) and align with the suggested adjustment to a limit of 25 dBA. Further, Landau notes that Seattle Rep's experience during construction of the Climate Pledge Arena indicates that the Leo K. Theater is highly sensitive to groundborne noise intrusion due to the very low ambient noise levels within the theater and the sensitive use of this space (i.e., unamplified performances).

Similarly, the vibration limit at Seattle Rep is identified as 72 VdB in DEIS Attachment N.3, Tables 6-13 and 6-14. A more appropriate limit for Seattle Rep, including both the Leo K. and Bagley Wright Theaters, is 65 VdB, which also aligns with FTA criteria for a "Concert Hall." In addition to groundborne noise impacts during construction of the Climate Pledge Arena, vibration impacts from this same construction resulted in movement (i.e., swaying) of lighting systems. An adjusted and more stringent vibration limit should apply to the Leo K. and Bagley Wright Theaters, reducing the potential for vibration impacts and stabilizing the lighting systems on these stages.

Noise and Vibration – Missing Sensitive Receivers

WSBLE DEIS Appendix N.3 omits two noise-sensitive spaces within Seattle Rep that should be included in the assessment of impacts from the WSBLE project: the Leo K. Rehearsal Space and the Poncho Forum. The Leo K. Rehearsal Space is regularly used for rehearsals. Performers rehearsing in this space require an ambient environment that is similar to what would be experienced during a live

performance in the Leo K. Theater. That is, it is expected that ambient noise and vibration levels would be low, and that interference from sources exterior to Seattle Rep would be minimal.

The Poncho Forum is used as both a rehearsal space and performance space, with retractable seating for audiences. The room is fitted with acoustic paneling to minimize reverberation of sounds. Similar to the Leo K. Rehearsal Space, use of the Poncho Forum requires that ambient noise and vibration levels are low to minimize disturbances to performers as well as the audience (when applicable).

Table 2 below summarizes proposed noise and vibration limits for these additional spaces, based on measurements and Landau's understanding of their uses. Included on Figure 5 are graphical illustrations of average measurements made in these spaces. Note that Table 2 also includes a summary of potential sources of noise and vibration impact that are anticipated in the Leo K. Rehearsal Space and Poncho Forum from DT-1 or DT-2.

Table 2: DEIS Appendix N.3 – Missing Seattle Center Noise- and Vibration-Sensitive Receivers

Resident Organization Buildings	Suggested Noise and Vibration Limits (a)		Summary of Use	Potential Source(s) of Noise or Vibration Impact (b)
	Noise (dBA)	Vibration (VdB)		
Seattle Rep Leo K. Rehearsal Space	30	65	Rehearsal space for Leo K. Theater; quiet is germane to use	DT-1 and DT-2 surface construction and tunneling; DT-1 and DT-2 operation
Seattle Rep Poncho Forum	30	72	Rehearsal and performance space; quiet is germane to use	DT-1 and DT-2 surface construction and tunneling; DT-1 and DT-2 operation

(a) Suggested limits appropriate for use of space and sensitivities to noise and vibration. Based on measurements by Landau and discussions with Seattle Rep.

(b) Potential for impact may be due to activities identified in this table and may also include activities not identified here. A complete assessment is required.

Chapter 6.2: Construction Noise Impacts

The construction noise impact assessment (i.e., airborne noise) was completed using the methods described in the FTA Guidance Manual. WSLBE DEIS Chapter 2.6, Table 2-6, Major Construction Activities and Duration, provides estimated durations for various construction activities related to WSBLE. Cut-and-cover station construction is estimated to take 4 to 6 years to complete. Therefore, the following review of construction noise impacts applies to a construction schedule that could last up to 6 years. Landau notes that construction noise levels will vary and likely decrease as construction progresses. However, the duration of time required for each element of cut-and-cover station construction (e.g., demolition, excavation, shoring, structural, etc.) is unknown.

Chapters 6.2.1.5 (Tunneling) and 6.2.1.6 (Cut-and-Cover)

WSBLE DEIS Appendix N.3, Chapter 6.2.1.5 summarizes surface-level construction noise that would occur in support of tunneling operations; WSBLE DEIS Appendix N.3, Chapter 6.2.1.6 summarizes surface-level construction noise that would occur in support of cut-and-cover station construction.

As identified in WSBLE DEIS Appendix N.3, Table 6-30, the location of the cut-and-cover construction area could be as near as 8 feet from Seattle Rep under either alternative DT-1 or DT-2. WSBLE DEIS Appendix J, Drawing L50-GSP103, provides an illustration of the DT-1 Seattle Center station and entrances. Upon review of this drawing, Landau notes that DT-1 surface construction near Seattle Rep would impact the south side of the building during cut-and-cover and station construction, the east side of the building during construction of the East Station Entrance, and the west side of the building during construction activities along Warren Avenue North just north of the DT-1 station.

WSBLE Appendix J, Drawing L50-GSP703 provides an illustration of the DT-2 Seattle Center station and entrances. Upon review of this drawing, Landau notes that DT-2 surface construction near Seattle Rep would impact the west side of the building during construction of the East Station Entrance as well as during cut-and-cover and station construction. Additional noise is likely to be received from construction activities along Warren Avenue North just south of Mercer Street.

WSBLE DEIS Appendix N.3, Chapter 6.2.1.5 identifies the use of excavators and backhoes for portal and shaft excavation, and trucks and loaders for transporting spoils. In addition, WSBLE DEIS Appendix N.3, Chapter 6.2.1.5 identifies ventilation fans that "would likely run continuously to provide fresh air to construction crews working inside the tunnel." For cut-and-cover construction, Chapter 6.2.1.6 identifies haul trucks and vibratory rollers as the loudest sources of construction noise, "over 88 dBA at 50 feet."

Give Seattle Rep's close proximity to both DT-1 and DT-2, Landau finds that the DEIS does not sufficiently evaluate the potential for noise impact to Seattle Rep from surface construction of stations or station entrances. Further, in addition to the potential for impact from the equipment identified in the DEIS, the following activities (i.e., sources of surface construction noise) were either not identified in the DEIS or additional information is required:

Truck Haul Routes

DEIS Chapter 2.6.6 (p. 2-88) states, "truck hauling would require a loading area, staging space for trucks awaiting loading, and provisions to prevent tracking soil on public streets. Truck haul routes and trucking hours would require approval by the City of Seattle. Surface hauling could occur at night during off-peak traffic periods or could be concentrated during the day to minimize noise in noise-sensitive areas." Table 7-1 of the FTA Guidance Manual (p. 176) identifies a sound level for haul trucks of 84 dBA at 50 feet.

The DEIS does not include assessment of noise from haul trucks. Noise from haul trucks includes engine idling during loading, travel to and from loading locations, and banging noise when trucks drive over uneven or unsecured surfaces that are often found at and near construction sites. Airborne noise from haul trucks is expected when collecting and moving spoils away from the DT-1 or DT-2 stations and station entrances. The likely haul routes would include Warren Avenue North and Mercer Street, both adjacent to Seattle Rep, and could therefore represent major sources of construction noise.

As indicated in the DEIS, haul trucks may operate during daytime or nighttime hours, depending on the permitted hours of hauling. Seattle Rep hosts both afternoon and late evening performances in the Leo K. and Bagley Wright Theaters. In addition, rehearsals in the Leo K. Rehearsal Space and Poncho Forum occur most days during typical daytime hours and may also occur during late evening hours. Noise from truck hauling therefore may impact facilities within Seattle Rep during day, evening, or late evening hours.

Construction Staging Areas

Noise from construction staging areas was not evaluated in the DEIS. Airborne noise from equipment moving within and to/from staging areas could represent a major source of airborne noise during construction.

Seattle Rep may be located within close proximity to construction staging areas either for DT-1 or DT-2. Although the locations of the staging areas are yet to be defined, an assessment of noise impact from staging areas should be completed that evaluates equipment within the staging areas and potential routes to/from staging areas.

Tunneling and Cut-and-Cover Construction Airborne Noise – Impacts Assessment

WSBLE DEIS Appendix N.3, Chapter 6.2 (p. 6-30) identifies construction activities that would generate the highest levels of airborne construction noise and includes tunneling and cut-and-cover station construction, both of which are proposed for preferred alternative DT-1 and alternative DT-2, both of which could occur near Seattle Rep.

Appendix N.3, Table 6-8 (p. 6-31) of the WSBLE DEIS provides a range of sound levels, referenced to 50 feet, that are anticipated from tunneling and cut-and-cover construction. Sound levels are based on the FTA Guidance Manual. As identified in Table 6-30 (p. 6-70), equipment and activities associated with cut-and-cover station construction (i.e., hydromill, caisson drilling, hoe ram, jackhammer, and bulldozer) could operate as near as 8 feet from Seattle Rep. Table 3 below identifies noise levels from the construction equipment summarized in DEIS Table 6-8, and calculates these sound levels at 8 feet, 15 feet, and 50 feet from construction equipment. Distance adjustments are based on noise propagation from a stationary source at +6 dBA per halving of distance to the source.

Table 3: Surface Construction Airborne Noise Equipment and Sound Levels

Construction Activity (a)	Construction Equipment (a)	Sound Level at 50 feet L_{eq} (dBA) (a)	Sound Level at 15 feet L_{eq} (dBA) (b)	Sound Level at 8 feet L_{eq} (dBA) (b)
Tunneling	Excavators, backhoes, haul trucks, loaders	84 to 86	94 to 96	100 to 102
Cut-and-Cover Station Construction	Excavators, backhoes, haul trucks, loaders, vibratory rollers	84 to 88	96 to 99	102 to 104

(a) Sound Transit WSBLE DEIS Appendix N.3, Table 6-8.

(b) Calculations by Landau based on 6 dBA per halving of distance to a stationary noise source.

L_{eq} = equivalent sound pressure level.

WSBLE DEIS Appendix N.3, Chapter 6.2.3.2, p. 6-38 indicates that for cut-and-cover construction of DT-1, "The construction noise would also impact spaces in the north end of the Seattle Center including Seattle Repertory Theatre and Cornish Playhouse."

For DT-2, the same page of the DEIS states that cut-and-cover construction "could result in noise impacts at the Seattle Repertory Theatre and Cornish Playhouse." Further, the same page of the DEIS states that "Most of these noise-sensitive spaces are on the perimeter of the building and face Republican Street." At Seattle Rep, facilities that are nearest Republican Street include the Leo K. Theater and the Leo K. Rehearsal Space.

As noted in Table 3, airborne noise levels from tunneling and cut-and-cover station construction could reach up to 104 dBA at a distance of 8 feet, expected at the south and east building facades of Seattle Rep. Note that the SMC sound level limits for construction, as correctly noted in WSBLE DEIS Appendix N.3, Table 3-4 (p. 3-7), is 85 dBA for a commercial district noise source affecting a commercial district receiving property, with shorter-duration increases permitted for impact-type equipment. Predicted sound levels from construction therefore could well exceed City sound level limits at Seattle Rep when construction equipment associated with tunneling and cut-and-cover stations operates within approximately 50 feet of Seattle Rep's south facade.

Although not included in the DEIS, and as indicated earlier in this letter, noise impacts from construction of the DT-1 East Station Entrance would occur immediately adjacent to the east side of Seattle Rep. Landau anticipates that much of the equipment identified in Table 3 for cut-and-cover stations also would be required for construction of the East Station Entrance. Therefore, the range of sound levels presented in Table 3 also would be anticipated at the east side of Seattle Rep.

Tunneling and Cut-and-Cover Construction Airborne Noise – Assessment of Impacts at Interior Spaces

Noise reductions provided by Seattle Rep's building itself (i.e., transmission loss provided by building construction materials) are not identified in the DEIS. Although Landau did not take exterior-interior measurements at Seattle Rep, such measurements were made at a resident organization of Seattle Center's Northwest Rooms. Results of these measurements indicate that the north facade of the

Northwest Rooms provides approximately 61 dBA in reduction to exterior noises. For the purposes of this assessment, Landau assumed a similar interior-exterior reduction applies to Seattle Rep. It should be noted that the actual level of reduction will vary depending on the effectiveness of the building to shield exterior noise and on the dominant noise frequency of the construction noise source.

Assuming an exterior-interior reduction of 61 dBA, Landau expects that, for construction noise received at Seattle Rep's south or east facade at 104 dBA (the highest predicted noise level for cut-and-cover construction, as received 8 feet from the noise source), interior noise levels would be 43 dBA (i.e., 104 dBA – 61 dBA = 43 dBA).

Using 43 dBA as an interior reference level 8 feet from construction activity, Landau estimated interior sound levels at each of the sensitive spaces within Seattle Rep. Estimates of sound levels at interior spaces were completed by estimating distances from the nearest areas of construction (i.e., the south or east facades of Seattle Rep) to each interior space and then applying a 6-dBA reduction per doubling of distance from the noise source, with 43 dBA at 8 feet as reference. The assessment assumes an additional reduction of 10 dBA is provided by interior walls to the Poncho Forum and the Bagley Wright Theater. The results of this assessment are summarized below in Table 4 for each noise-sensitive interior space at Seattle Rep.

Table 4: Surface Construction Interior Airborne Noise Impacts (DT-1)

Seattle Rep Noise Sensitive Space	Distance from Nearest Exterior Construction Activity to Interior Space (feet)	Impact Assessment Result			
		Ambient Noise Level (dBA) (c)	Reference Sound Level Inside Building Facade	Interior Construction Noise Level (dBA) (d)	Increase Over Ambient Noise Level (dBA)
Leo K. Theater	8 (a)	26	43	43	17
Leo K. Rehearsal Space	8 (a)	36		43	7
Poncho Forum	75 (b)	30		14 (e)	0
Bagley Wright Theater	45 (b)	32		18 (e)	0

(a) Sound Transit WSBLE DEIS Appendix N.3, Table 6-30, p. 6-70 applies to most sensitive spaces within Seattle Rep.
(b) Estimated by Landau.
(c) Sound level measurements by Landau, January and March 2022.
(d) Calculated using standard adjustment for distance from a point source: SPL2 = SPL1 + 20*Log(D1/D2).
(e) Includes an assumed 10-dBA reduction provide by interior walls.

The impact to the Leo K. Theater and the Leo K. Rehearsal Space is shown on Figure 2, which illustrates impacts as a "heat map," highlighting the spaces within Seattle Rep that would be impacted by airborne construction noise during tunneling and construction of the East Station Entrance for DT-1.

As summarized above in Table 4 and as shown on Figure 2, airborne construction noise could exceed existing conditions in the Leo K. Theater and Leo K. Rehearsal Space by up to 17 dBA and 7 dBA,

respectively for a period of up to 6 years (i.e., the estimated duration of cut-and-cover station construction, as identified in WSBLE DEIS Chapter 2.6, Table 2-6). Note that a 10-dBA increase in noise is perceived as a doubling of sound "loudness." So, an increase of 17 dBA, as predicted at the Leo K. Theater, would be perceived as more than twice as loud as ambient conditions, a clearly perceptible increase in ambient noise. Actual increases in noise may be higher depending on exterior-interior noise reductions provided by the building (i.e., if less than the estimated 61-dBA reduction). The results of this assessment indicate that mitigation will be required during surface construction related to tunneling and the cut-and-cover station. Increases over ambient conditions up to 17 dBA will very likely result in significant impacts to the Leo K. Theater, affecting performances and the audience experience.

It is noted in WSBLE DEIS Appendix N.3, Chapter 6.2.3.2, p. 6-38 that "the loudest construction phase is expected to be near the beginning of construction during the cutting and removal of the existing street, which would likely include the use of impact equipment such as jackhammers or hoe rams." Landau notes that during other phases construction noise levels may be lower. Note that the ranges of sound levels provided in Table 3 and estimates of impacts provided in Table 4 are based on the FTA reference sound levels for excavators, backhoes, haul trucks, loaders, and vibratory rollers. Therefore, reference sound levels in Table 3 do not represent the loudest noises that could occur from use of jackhammers and hoe rams and actual noise impacts may, during the initial phases, be higher than is predicted in Table 4.

For DT-2, WSBLE DEIS Appendix N.3, Table 6-30 indicates that surface construction also could be as near as 8 feet from Seattle Rep. Landau estimates that construction of the DT-2 East Station Entrance would occur as near as approximately 60 feet to the west of Seattle Rep, and the location of the cut-and-cover excavation area for DT-2 would be approximately 130 feet from Seattle Rep. Landau estimates that impacts from DT-2 would be lower than is predicted for DT-1 during cut-and-cover and East Entrance Station construction. However, should Warren Avenue North be used as a staging area or include active construction that is near Seattle Rep, impacts to interior spaces from airborne noise may occur.

Impact Noise

As indicated above, the loudest construction phase would likely include the use of impact equipment such as jackhammers or hoe rams. WSBLE DEIS Appendix N.3, Chapter 3.1.3 correctly summarizes the City construction criteria. Specifically, this section notes that impact noises, such as those noises generated by jackhammers and hoe rams, will be limited to the daytime hours of 8 a.m. to 5 p.m. weekdays and 9 a.m. to 5 p.m. weekends. The Final Environmental Impact Statement (FEIS) and subsequent construction management plans should include consideration of timing restrictions for these types of impact noises.

Chapter 6.3: Operational Vibration Impacts

The operational vibration section of WSBLE DEIS Appendix N.3 includes predicted impacts from both vibration and groundborne noise during operation of the proposed DT-1 and DT-2 alternatives. WSBLE DEIS Appendix N.3, Tables 6-13 (p. 6-51) and 6-14 (p. 6-53) identify operational groundborne noise and vibration impacts for DT-1 and DT-2, respectively.

The results in WSBLE DEIS Appendix N.3, Table 6-13 (and in WSBLE DEIS Appendix N.3, Attachment N.3H, Table 7-3) indicate that the Leo K. Theater would likely experience groundborne levels of up to 48 dBA during operation of DT-1, a 13-dBA exceedance of the DEIS-applied limit of 35 dBA. Table 6-14 indicates that the Leo K. Theater would likely experience groundborne noise levels of up to 28 dBA during operation of DT-2, below the DEIS-applied limit of 35 dBA.

Landau finds that additional information and/or corrections are required to evaluate completely the potential for operational vibration and groundborne noise impacts to Seattle Rep. The following summarizes these findings:

Groundborne Noise Limits

Leo K. Theater

As summarized in Table 1, the groundborne noise limit for Seattle Rep's Leo K. Theater is not sufficiently protective and should be adjusted to 25 dBA, identified as the FTA Special Buildings limit for a "Concert Hall" (i.e., not based on the 35-dBA limit for a theater). Correcting the limit at the Leo K. Theater would result in a greater groundborne noise impact (23 dBA over limit) for operation of DT-1. Further, for operation of DT-2, correcting the limit would result in a groundborne noise impact (i.e., 3 dBA over limit of 25 dBA).

Bagley Wright Theater

WSBLE DEIS Appendix N.3, Attachment N.3H, Table 7-3 identifies groundborne noise levels from DT-2 that are higher at the Leo K. Theater (28 dBA) than at the Bagley Wright Theater (19 dBA). The Bagley Wright Theater is substantially closer to DT-2 than the Leo K. Theater, and it would stand to reason that predicted groundborne noise levels at the Bagley Wright Theater would be higher during operation of DT-2. The assessment of impact at the Bagley Wright Theater should be confirmed and likely corrected to accurately identify whether impacts are predicted for this space under DT-2.

Leo K. Rehearsal Space

The Leo K. Rehearsal Space was not included the DEIS. However, as previously mentioned, this space is used for noise- and vibration-sensitive rehearsals and should be included when considering the potential for groundborne noise and vibration impacts from WSBLE operation. This space is located at the southwest corner of Seattle Rep and near the cut-and-cover area for DT-1; the space is also adjacent to the proposed construction area defined in the DEIS, located east of Seattle Rep within the right-of-way of Warren Avenue North. As suggested in Table 2, the proposed noise limit for this space

is 30 dBA. The suggested noise limit is 6 dBA lower than was measured by Landau (see Figure 5; the measured level at Leo K. Rehearsal Space is 36 dBA); however, groundborne noise is a different character of sound than is present in the Leo K. Rehearsal Space ambient environment. A limit of 30 dBA would ensure that the noise environment of the Leo K. Rehearsal Space is protected.

Poncho Forum

Similar to the Leo K. Rehearsal Space, the Poncho Forum was not included the DEIS. However, as previously indicated, this space is used for noise- and vibration-sensitive performances and rehearsals and should be included when considering the potential for groundborne noise and vibration impacts from WSBLE operation. As suggested in Table 2, the suggested noise limit for this space is 30 dBA, which agrees with results of ambient measurements made by Landau (see Figure 5).

Revised Assessment of Operational Groundborne Noise Impacts

Assessment of Exceedance of Sound Level Limits

For this assessment, Landau compared predicted operational groundborne noise levels to the corrected limits for the Leo K. Theater as well as new limits for spaces not included in the DEIS (i.e., the Leo K. Rehearsal Space and Poncho Forum). The results were compared with the operational groundborne noise assessment results that are summarized WSBLE DEIS Appendix N.3, Table 6-13. The results of this comparison for DT-1 are summarized below in Table 5.

Table 5: Assessment of Groundborne Noise Exceedance of Limits, DT-1

Seattle Rep Noise Sensitive Space	DT-1 Operational Noise Level (a)	Groundborne Noise Limit		Exceedance	
		DEIS (a)	Adjusted and New Limits (d)	Compared to DEIS (b)	Compared to Adjusted and New Limits
Leo K. Theater	48	35	25 (d)	13	23
Leo K. Rehearsal Space	48 (b)	-	30 (d)	-	18
Poncho Forum	43 (c)	-	30 (d)	-	13
Bagley Wright Theater	37	35	35	2	2

(a) Sound Transit WSBLE DEIS Appendix N.3, Table 6-13 and Attachment N.3H, Table 7-2.
(b) Impact assumed identical to Leo K. Theater due to similar distance from DT-1.
(c) Impact assumed approximately equal to average of predicted impact to Leo K. Theater and Bagley Wright Theater.
(d) Based on sound level measurements by Landau in 2022 and sensitivities of each space.

As summarized in Table 5, applying adjustments to the noise limit at the Leo K. Theater and including an assessment of the Leo K. Rehearsal Space and Poncho Forum results in high levels of noise impact at most spaces within Seattle Rep. Specifically, at the Leo K. Theater, DEIS-predicted groundborne noise levels would exceed the adjusted limit by 23 dBA. Similarly, at the Leo K. Rehearsal Space DEIS-predicted groundborne noise levels would exceed the assumed limit by 18 dBA. Exceedances of up to 13 dBA are predicted at the Poncho Forum.

For DT-2, as summarized in WSBLE DEIS Appendix N.3, Attachment N.3H, Table 7-3, predicted groundborne noise impacts would be below applicable limits at the Bagley Wright Theater. Adjusting the Leo K. Theater limit to 25 dBA would result in an exceedance of 3 dBA for DT-2. However, as noted previously, Landau finds that the predicted impacts under DT-2 do not appear correct and should be re-evaluated before a thorough review and conclusion can be made.

Assessment of Impact

In addition to the assessment of exceedance of groundborne noise limits, Landau evaluated the potential for impacts based on increases over existing ambient conditions (i.e., a comparison to actual ambient levels, not limits). The assessment was completed to highlight the degree of impact that may occur at Seattle Rep with the DT-1 alignment. Because Landau is not confident that the DEIS has accurately estimated groundborne noise for DT-2, the following assessment focuses only on DT-1.

Table 6 summarizes predicted operational groundborne noise emissions at each space within Seattle Rep and compares these predictions with existing ambient conditions, as documented by Landau through noise measurements made in early 2022. The increase in sound levels over ambient conditions is provided in the far right column of this table.

Table 6: Assessment of Operational Groundborne Noise Impacts, DT-1

Seattle Rep Noise Sensitive Space	DT-1 Operational Noise Level (dBA) (a)	Existing Ambient Noise Level (dBA) (d)	DT-1 Operational Noise Increase Over Ambient Noise (dBA)
Leo K. Theater	48	26	22
Leo K. Rehearsal Space	48 (b)	36	12
Poncho Forum	43 (c)	30	13
Bagley Wright Theater	37	32	5

(a) Sound Transit WSBLE DEIS Appendix N.3, Table 6-13 and Attachment N.3H Table 7-2.
(b) Impact assumed identical to Leo K. Theater due to similar distance from DT-1.
(c) Impact assumed approximately equal to average of predicted impact to Leo K. Theater and Bagley Wright Theater.
(d) Based on sound level measurements by Landau in 2022.

As summarized in Table 6, a comparison of predicted groundborne noise levels from operation with existing ambient sound levels suggests high levels of impact at Seattle Rep for DT-1. Noise levels at the Leo K. Theater would exceed ambient conditions by up to 22 dBA, a clearly audible and discernible impact that could inhibit use of this facility. That is, as noted earlier, a 10-dBA increase in noise is perceived as a doubling of sound "loudness." So, an increase of 22 dBA, as predicted at the Leo K. Theater for operational groundborne noise impact, would be perceived as more than four times as loud as ambient conditions, a clearly perceptible increase in ambient noise. Increases in noise at the Leo K. Rehearsal Space and Poncho Forum would be up to 12 dBA and 13 dBA over ambient conditions, respectively, also clearly perceptible as more than twice as loud as ambient conditions. At the Bagley Wright Theater, the impact would be less, but a 5-dBA increase over ambient conditions,

especially from a noise source that is primarily a low-frequency rumble (i.e., groundborne noise), is expected to negatively affect the usability of this theater.

Included on Figure 4 is a heat map that highlights impacts that would occur from increases over ambient conditions from DT-1 operational groundborne noise.

Train Speed

As summarized in WSBLE DEIS Appendix N.3, Tables 6-13 (p. 6-51) and 6-14 (p. 6-53), light rail train speeds were assessed as part of the calculation of groundborne noise and vibration. Landau finds that there are inconsistencies or potential errors that warrant further clarification.

For preferred alternative DT-1, the train speed through the Seattle Center campus is identified in Table 6-13 as 45 miles per hour (mph) near most noise-sensitive receivers, including the Seattle International Film Festival (SIFF) Film Center, which is located immediately southeast of Seattle Rep. But at Seattle Rep and the Vera Project, rail speeds are predicted to be 30 mph. Landau anticipates that rail speeds between Seattle Rep and SIFF would be identical and not differ by 15 mph. Appendix N.3 of the WSBLE DEIS does not provide an explanation for the discrepancy in rail speeds. It is understood that rail speeds would slow when trains are arriving at the station and would increase when trains are departing. However, the discrepancies in rail speeds suggest that there may be calculation errors related to the speed of trains along the rail alignment.

Chapter 6.4: Construction Vibration Impacts

Construction-related vibration impacts, including groundborne noise, are predicted to occur from tunneling (Chapter 6.4.1) and surface construction (Chapter 6.4.2). As indicated earlier, WSLBE DEIS Chapter 2.6, Table 2-6 provides estimated durations for various construction activities related to WSBLE. Tunneling for the Downtown Segment is estimated to take 2.5 to 3 years and cut-and-cover station construction is estimated to take 4 to 6 years to complete.

Chapter 6.4.1: Tunneling Vibration Impacts

During tunneling, the DEIS predicts that vibration impacts would not occur at Seattle Rep. The following summarizes adjustments in vibration and groundborne noise limits, as previously identified (see Table 1), as well as limits for spaces that should be included in the assessment (see Table 2) that would result in additional or greater impacts to sensitive spaces within Seattle Rep.

As summarized in Table 1, Landau recommends adjusting the vibration limit for Seattle Rep to 65 VdB from 72 VdB for both the Leo K. and Bagley Wright Theaters. WSBLE DEIS Appendix N.3, Chapter 6.4.1, Table 6-25 identifies a predicted supply train level of 67 VdB at Seattle Rep. Adjusting the limit at Seattle Rep would result in a predicted vibration level that is 2 VdB over the 65 VdB limit at Seattle Rep during unmitigated use of the supply train with alternative DT-1.

Regarding groundborne noise, Landau recommends adjusting the groundborne noise limit at Seattle Rep to 25 dBA (see Table 1). This would result in groundborne noise impacts from both cutterhead and supply train operation that exceed what is predicted in WSBLE DEIS Appendix N.3, Chapter 6.4.2, Table 6-27. For example, unmitigated supply train groundborne noise at Seattle Rep is predicted to be 40 dBA, which would exceed the adjusted limit of 25 dBA by 15 dBA and would be clearly discernible and disruptive.

Table 7 summarizes predicted tunneling groundborne noise emissions at each space within Seattle Rep and compares these predictions with existing ambient conditions, as documented by Landau through noise measurements made in early 2022. The increase in sound levels over ambient conditions is provided in the far right column of this table.

Table 7: Assessment of Tunneling Groundborne Noise Impacts, DT-1

Seattle Rep Noise Sensitive Space	DT-1 Tunneling Noise Level (dBA) (a)	Existing Ambient Noise Level (dBA) (d)	DT-1 Operational Noise Increase Over Ambient Noise (dBA)
Leo K. Theater	40	26	14
Leo K. Rehearsal Space	40 (b)	36	4
Poncho Forum	35 (c)	30	5
Bagley Wright Theater	29	32	0

(a) Sound Transit WSBLE DEIS Appendix N.3, Table 6-27.
(b) Impact assumed identical to Leo K. Theater due to similar distance from DT-1.
(c) Impact assumed approximately equal to average of predicted impact to Leo K. Theater and Bagley Wright Theater.
(d) Based on sound level measurements by Landau in 2022.

As summarized in Table 7, a comparison of predicted groundborne noise levels from tunneling with existing ambient sound levels suggests high levels of impact at Seattle Rep for DT-1. Noise levels at the Leo K. Theater would exceed ambient conditions by up to 14 dBA, a clearly audible and discernible impact that would be perceived as more than twice as loud as ambient conditions and could inhibit use of this facility for up to 3 years (the estimated duration of tunneling for the Downtown Segment). Impacts to the Leo K. Rehearsal Space and Poncho Forum would be much less, but very likely perceptible and possibly disruptive during use of these spaces.

Included on Figure 3 is a heat map that highlights impacts that would occur from increases over ambient conditions from DT-1 tunneling groundborne noise.

Tunneling Equipment

WSBLE DEIS Appendix N.3, Section 6.4.1.2 and Table 6-26 (p. 6-66) identify equipment that would generate the highest levels of vibration during tunneling, including the boring machine cutterhead, thrust-jack retraction, and supply trains with steel wheels and jointed tracks.

In the footnote of Table 6-27 (p. 6-67), the WSBLE DEIS states, "The predicted levels for the thrust jack are more than 5 dB below the impact threshold for all sensitive receivers." Groundborne noise predictions for thrust-jack retraction are not provided in the WSBLE DEIS. However, Table 6-26 (p. 6-66) provides a range of sound levels of 13 to 29 dBA, as measured between 0 and 200 feet from thrust-jack operation. The range in sound levels for supply trains with steel wheels and jointed tracks is 24 to 28 dBA. While the median level of groundborne noise for supply trains is clearly higher than for thrust-jack retraction, there is a potential for thrust-jack retraction to generate groundborne noise levels that are as high as supply trains, according to the data provided in Table 6-26. The potential for groundborne noise impact is further increased when the limits for Seattle Rep are adjusted (i.e., lowered).

A more detailed assessment should be conducted that further evaluates the potential for groundborne noise and vibration impact from thrust-jack retraction.

Chapter 6.4.2: Surface Construction Vibration Impacts

WSBLE DEIS Appendix N.3, Table 6-29, p. 6-70 identifies distances for impact to Special Buildings during surface construction. The minimum distance for the least sensitive spaces (i.e., Vibration Criteria A, or V.C.-A) is greater than would be realized at Seattle Rep for the equipment identified in this table. For example, the minimum distance for potential impact from a bulldozer under the V.C.-A curve is 125 feet, and the nearest distance to Special Buildings located near surface construction areas (Seattle Rep) is 8 feet, as documented in WSBLE DEIS Appendix N.3, Table 6-29.

WSBLE DEIS Appendix N.3, Chapter 6.4.2.2, p. 6-70 states that "Surface construction vibration has not been assessed for Category 1 or special-use buildings near tunnel alignments. However, vibration from surface construction may be of concern if these buildings are close to the tunnel portals or station construction. These activities should be assessed in the Construction Vibration Control Plan."

Given the degree of impact that may occur from surface vibration during construction (see Tables 6-29 and 6-30) and given the need to understand if effective mitigation of these impacts is feasible, a more detailed assessment of the potential impacts and proposed mitigation should be included in a supplemental DEIS study, in lieu of only requiring future assessments through a control plan. Specifically, for cut-and-cover station excavation, an additional assessment should be completed that evaluates the potential for structural damage to Seattle Rep.

Slurry Wall Demolition

The south wall of the DT-1 station design includes a diagonal portion that would extend underneath the Northwest Rooms, including underneath the SIFF Film Center, Vera Project, and KEXP. A profile view of the station is provided on WSBLE DEIS Appendix J, Drawing B11-ASX102. Landau understands, through ongoing workshops hosted by Sound Transit, that the southern wall of the DT-1 station would be constructed first as a vertical slurry wall, and then widened below grade, toward the south, to provide sufficient space for a station platform. Further, Landau understands that construction

methods to expand the station footprint include breaking large portions of the slurry wall with a hoe ram.

The WSBLE DEIS does not include a review of impacts that are specific to the breaking of the slurry wall. However, demolition of this wall would occur very near and to the south of Seattle Rep. It is anticipated that high levels of vibration would be emitted during this process, and these were not considered or included in the DEIS. Given the high levels of vibration from this activity and the likely lengthy construction schedule, there is a high potential for substantial impacts to Seattle Rep during this phase of construction.

Station Entrances

The WSBLE DEIS provides very minimal information on the potential for noise and vibration impacts from construction of the station entrances. Specifically, for DT-1 the proposed East Station Entrance would be located directly adjacent to Seattle Rep. Construction of this station entrance would likely require demolition of existing structures and surfaces, excavation and hauling of materials, reinforcement of station walls, and construction of the station itself. Vibration and groundborne noise impacts are likely to be experienced at Seattle Rep.

Adjusting the vibration limits for the Leo K. and Bagley Wright Theaters to 65 VdB from 72 VdB would be protective of these facilities during surface construction of the East Station Entrance given the low levels of ambient vibration at both facilities (see ambient vibration measurement data in WSBLE DEIS Appendix N.3, Attachment N.3H, Table 7-1, and verified by Landau measurements in January 2022).

Given the very close proximity of the DT-1 East Station Entrance to Seattle Rep and the proximity of Seattle Rep to the DT-2 East Station Entrance, as well as the recommended adjustments of vibration limits for Seattle Rep, an assessment of station entrance construction should be completed to evaluate the potential for impacts. In addition, an assessment should be completed of the potential for structural damage to Seattle Rep's building.

Chapter 7: Noise and Vibration Mitigation Measures

Chapter 7.2: Construction Noise Mitigation

DEIS Appendix N.3, Chapter 7.2 (p. 7-16) identifies standard mitigation measures for construction noise. The following summarizes mitigation measures that were not included but should be considered:

General Construction Equipment

Loud construction equipment operating within the cut-and-cover construction area could operate as near as 8 feet from Seattle Rep. As summarized in Table 3, estimated sound levels could reach 104 dBA at the exterior facade of the Seattle Rep and could reach up to 43 dBA at interior spaces, potentially impacting noise-sensitive performance and rehearsal spaces (see Table 4).

Mitigation measures summarized in the WSBLE DEIS are effective strategies to reduce airborne construction noise but do not specifically target the potential for noise impacts.

Mitigation measures should include an emphasis on administrative controls, scheduling the noisiest activities during times that would be less likely to interfere with noise-sensitive operations. This will require continued coordination with Seattle Rep.

Noise barriers could be installed at locations where airborne noise impacts are predicted or anticipated, and where there is sufficient room to build a wall that is long and tall enough to be effective. Noise barriers should be required as part of the project's Construction Noise Control Plan and should be considered for the south, east, and west walls of Seattle Rep, shielding them from station and East Entrance construction noise impacts.

Tunnel Ventilation Fans

Ventilation fans will be required to provide fresh air to crew within the tunnel and could operate 24 hours per day. The locations of the fans are not yet defined but could be located very near to Seattle Rep. Due to the low-frequency noise generated by such fans, mitigation may be required to ensure that fan noise does not result in impacts to interior performance and recording spaces.

Potential mitigation measures could include quieter fan models, strategic placement of fans, silencers, barriers, or other measures. Further, the FEIS should include specific language within the Construction Noise Control Plan regarding exhaust fan noise.

Haul Trucks

Noise from idling and the movement of haul trucks during construction, as well as noises from driving over uneven or unsecured surfaces, may result in impacts at noise-sensitive spaces along routes accessing DT-1 or DT-2. Haul truck routes are not yet defined; however, an assessment should be completed to determine if mitigation of noise from haul trucks is warranted.

Further, the FEIS should include specific language within the Construction Noise and Vibration Control Plan regarding permitted haul routes that minimize the potential for impact.

Landau anticipates that Mercer Street would likely serve as a primary haul route for either DT-1 or DT2. If so, there is a possibility that additional noise impacts may occur at Seattle Rep. A study should be completed to identify the number of trucks in use per hour during various construction phases, what the predicted impacts may be to Seattle Rep, and what mitigation measures may be warranted (e.g., limited hauling hours, limited trucks per hour).

Staging Areas

Mitigation of staging area noise should be included in an updated noise impact assessment. Mitigation measures could include the strategic location of staging areas to minimize impacts from noise

emissions related to staging areas, noise barriers, and other measures as defined in WSBLE DEIS Appendix N.3, Chapter 7.2.

Chapter 7.3: Operational Vibration Mitigation

WSBLE DEIS Appendix N.3, Chapter 7.3.2.2 (p. 7-26) provides DT-1 operational groundborne noise and vibration measures that would mitigate impacts at "recording studios and performance spaces in Seattle Center" (Chapter 7.3.2.2., p. 7-26). Included are high-resilience fasteners along 900 feet of new track between construction alignment stations 79+00 and 88+00.

Table 6-11 (p. 140) of the FTA Guidance Manual states that high-resilience fasteners can achieve 5 dB of reduction in groundborne noise from tracks at frequencies above 40 hertz (Hz). As stated in WSBLE DEIS Appendix N.3, Attachment N.3H, Chapter 8.4, p. 8-20, "Because Sound Transit expects at least 5 decibels of reduction from the tunnel structure that is not included in the prediction model, no additional mitigation measures beyond high-resilience fasteners are proposed."

If the above-noted Sound Transit expectation is true, groundborne noise impacts from DT-1 operation would not be mitigated for Seattle Rep. As noted in this review, Landau recommends that for Seattle Rep, groundborne noise limits be adjusted to a lower level that is more protective of the uses within these spaces, including the Leo K. Theater (see Table 1). The result would be DT-1 operational groundborne noise that exceeds the limits at Seattle Rep by 23 dBA. Accounting for an assumed 5-dBA reduction from high-resilience fasteners and an additional 5-dBA reduction from the structure itself, the Leo K. Theater would likely experience increases of 13 dBA above the limit. Therefore, because impacts would occur even with high-resilience fasteners, Landau recommends that a higher degree of mitigation be considered, such as a floating slab and thicker tunnel materials.

For DT-2, WSBLE DEIS Appendix N.3, Attachment N.3H, Table 7-3 indicates that impacts may occur at the Leo K. Theater when applying the adjusted groundborne noise limit identified in Table 1 (i.e., predicted level is 28 dBA; the proposed limit is 25 dBA). Further, as previously noted, there are apparent errors in the calculation of impacts at the Bagley Wright Theater that result in predicted groundborne noise impacts at this space from DT-2. Sound Transit should confirm whether impacts are predicted, and the degree to which these impacts might occur. Once confirmed, a reassessment of DT-2 operational mitigation should be completed.

Chapter 7.4: Construction Vibration Mitigation

Chapter 7.4.1: Potential Surface Construction Vibration Mitigation

WSBLE DEIS Appendix N.3, Chapter 7.4.1 (p. 7-31) identifies surface vibration mitigation measures that include pre-construction surveys, construction timing, equipment locations, continuous vibration monitoring, and alternative construction methods. The following summarizes mitigation measures that are not included or that require additional detail:

Construction Vibration Control Plan

As noted in Chapter 6.4.2.2 (p. 6-70) of the WSBLE DEIS Appendix N.3, "Surface construction vibration has not been assessed for Category 1 or special-use buildings near tunnel alignments. However, vibration from surface construction may be of concern if these buildings are close to the tunnel portals or station construction. These activities should be assessed in the Construction Vibration Control Plan."

Construction vibration measures should be updated once a more detailed assessment of surface vibration measures is completed to support a Construction Vibration Control Plan. Given the high potential for surface vibration impact during construction, mitigation of surface vibration will be critical to Seattle Rep.

Chapter 7.4.2 Potential Tunneling Vibration Mitigation

WSDBLE DEIS Appendix N.3, Chapter 7.4.2 (p. 7-32) identifies mitigation measures to reduce the potential for vibration and groundborne noise impact during tunneling. The following summarizes key elements of this review:

Supply Train

Details provided in WSBLE DEIS Appendix N.3, Chapter 7.4.2 are focused on mitigating vibration from the supply train, including reduced supply train speeds, smooth running surfaces, reduced gaps between rail sections, adding rubber pads between ties, and using rubber tires on supply trains.

As noted, WSBLE DEIS Appendix N.3, Table 6-27 (p. 6-67) summarizes impacts from construction that states unmitigated supply trains could result in groundborne noise levels at Seattle Rep that are up to 40 dBA and exceed the unadjusted noise limit by 5 dBA (and exceed the adjusted noise limit by 15 dBA). In addition to the mitigating effects of the measures identified above, Chapter 7.4.2 (p. 7-32) of the WSBLE DEIS Appendix N.3 suggests that rubber tires on supply trains could provide effective mitigation of vibration and groundborne noise at frequencies above 10 Hz.

Given the high level of impact that may occur due to the supply trains at Seattle Rep and that predictive modeling has not been completed to fully evaluate the mitigating effect of rubber tires on supply trains, the Construction Vibration Control Plan should be supported by a detailed assessment of rubber tires on supply trains. The assessment should demonstrate that impacts to Seattle Rep are effectively mitigated to below applicable noise limits and ambient levels.

Thrust Jack

As indicated, mitigation of vibration from thrust jacks may be warranted through slower retraction of the jacks. An evaluation should be completed once a more detailed assessment of the potential for impact from this activity is completed. If necessary, mitigation measures should be included in the Construction Vibration Control Plan.

Cutterhead

As stated in WSBLE DEIS Appendix N.3, Chapter 7.4.2, p. 7-32, it is not possible to mitigate vibration from the tunneling cutterhead. However, as stated, mitigation can be achieved through vibration monitoring and coordination with Seattle Rep. The FEIS and Construction Vibration Control Plan should specify locations/receivers to be monitored at Seattle Rep, including the number of monitors and duration of monitoring, as well as the established thresholds above which action is to be taken. Also, the Plan should include clear direction for the General Contractor to coordinate with Seattle Rep to provide sufficient advance notice to allow noise-sensitive events to be scheduled accordingly.

* * * * *

If you have you any questions or comments regarding the information provided in this letter report, please contact the undersigned.

LANDAU ASSOCIATES, INC.

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References

FTA. 2018. Transit Noise and Vibration Impact Assessment Manual. FTA Report No. 0123. Federal Transit Administration. September. https://www7.fta.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

Sound Transit. 2021. Design Criteria Manual. Amendment 11 Revision 5. May. https://www.soundtransit.org/sites/default/files/documents/design-criteria-manual-may-2021.pdf.

USDOT, FTA, and Sound Transit. 2022a. West Seattle and Ballard Link Extensions Draft Environmental Impact Statement. US Department of Transportation, Federal Transit Administration, and Central Puget Sound Regional Transit Authority (Sound Transit). January. https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-ballard-link-extensions-draft-environmental-impact-0.

USDOT, FTA, and Sound Transit. 2022b. West Seattle and Ballard Link Extensions Draft Environmental Impact Statement, Appendix N.3: Noise and Vibration Technical Report. US Department of Transportation, Federal Transit Administration, and Central Puget Sound Regional Transit Authority (Sound Transit). January. https://www.soundtransit.org/sites/default/files/documents/16a-wsble-drafteis-noisetechreport-202201.pdf.

Attachments

Figure 1: Overview Map
Figure 2: Landau Ambient Noise Measurements at Seattle Rep
Figure 3: Landau Ambient Vibration Measurements at Seattle Rep
Figure 4: Surface Construction Noise Impact, DT-1
Figure 5: Tunneling Noise Impact, DT-1
Figure 6: Operational Noise Impact, DT-1

Note

1. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.

West Station Entrance DT-2

Below Grade Platform

East Station Entrance DT-2

Mercer Street

Queen Anne Avenue N

1st Avenue N

Warren Avenue N

Seattle Repertory Theatre

Theatre Commons

Cornish Playhouse

Founder's Court

Pacific NW Ballet

East Station Entrance DT-1

Republican Street

West Station Entrance DT-1

Below Grade Platform

KEXP

The Vera Project

SIFF Film Center

International Fountain Lawn

International Plaza (Northwest Courtyards)

N

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Legend

DT-1 Tracks | DT-1 Platform and Stations | DT-1 Construction Areas

DT-2 Tracks | DT-2 Platform and Stations | DT-2 Construction Areas

0 100 200

Scale in Feet

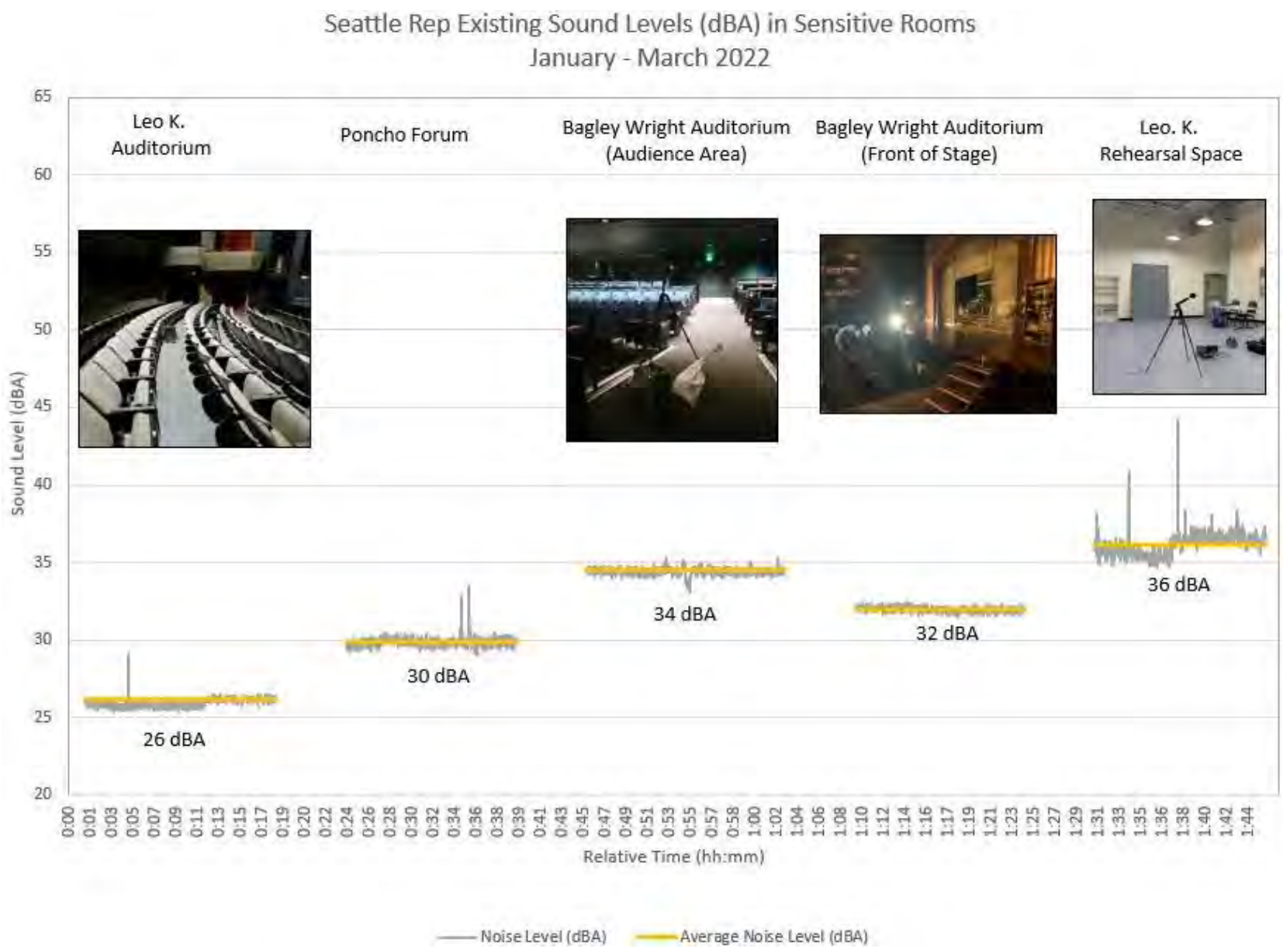
Basemap source: Esri, 2022. Sound Transit. HTNB.

LANDAU ASSOCIATES

Sound Transit WSBLE DEIS
Seattle Rep
Seattle, Washington

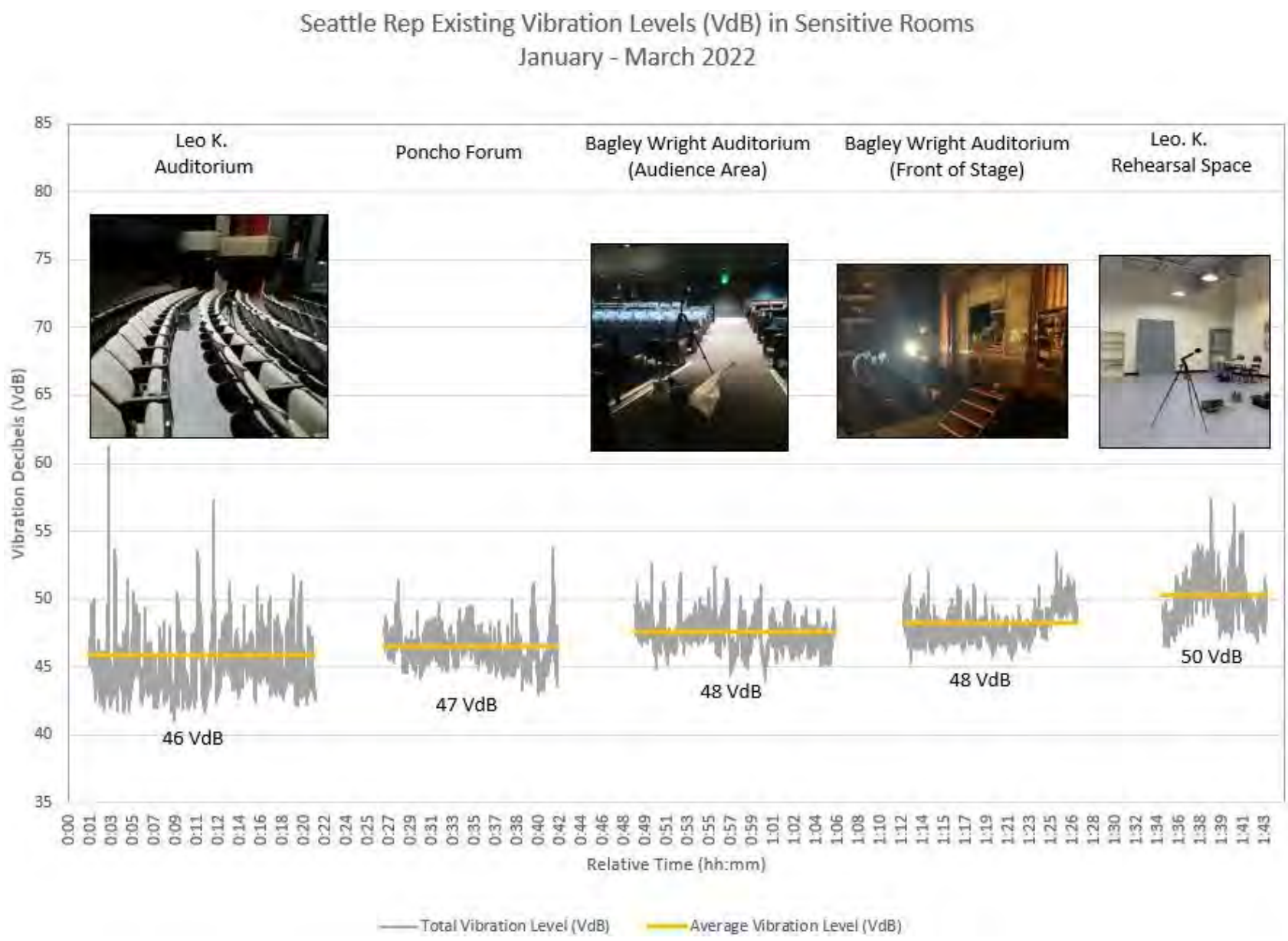
Overview Map

Figure 1


Seattle Rep Existing Sound Levels (dBA) in Sensitive Rooms
January - March 2022
Leo K. Auditorium
Poncho Forum
Bagley Wright Auditorium (Audience Area)
Bagley Wright Auditorium (Front of Stage)
Leo. K. Rehearsal Space
Sound Level (dBA)
65
60
55
50
45
40
35
30
25
20
26 dBA
30 dBA
34 dBA
32 dBA
36 dBA
0:00 0:01 0:03 0:05 0:07 0:09 0:11 0:13 0:15 0:17 0:19 0:20 0:22 0:24 0:26 0:28 0:30 0:32 0:34 0:36 0:38 0:39 0:41 0:43 0:45 0:47 0:49 0:51 0:53 0:55 0:57 0:58 1:00 1:02 1:04 1:06 1:08 1:10 1:12 1:14 1:16 1:17 1:19 1:21 1:23 1:25 1:27 1:29 1:31 1:33 1:35 1:36 1:38 1:40 1:42 1:44
Relative Time (hh:mm)
Noise Level (dBA)
Average Noise Level (dBA)

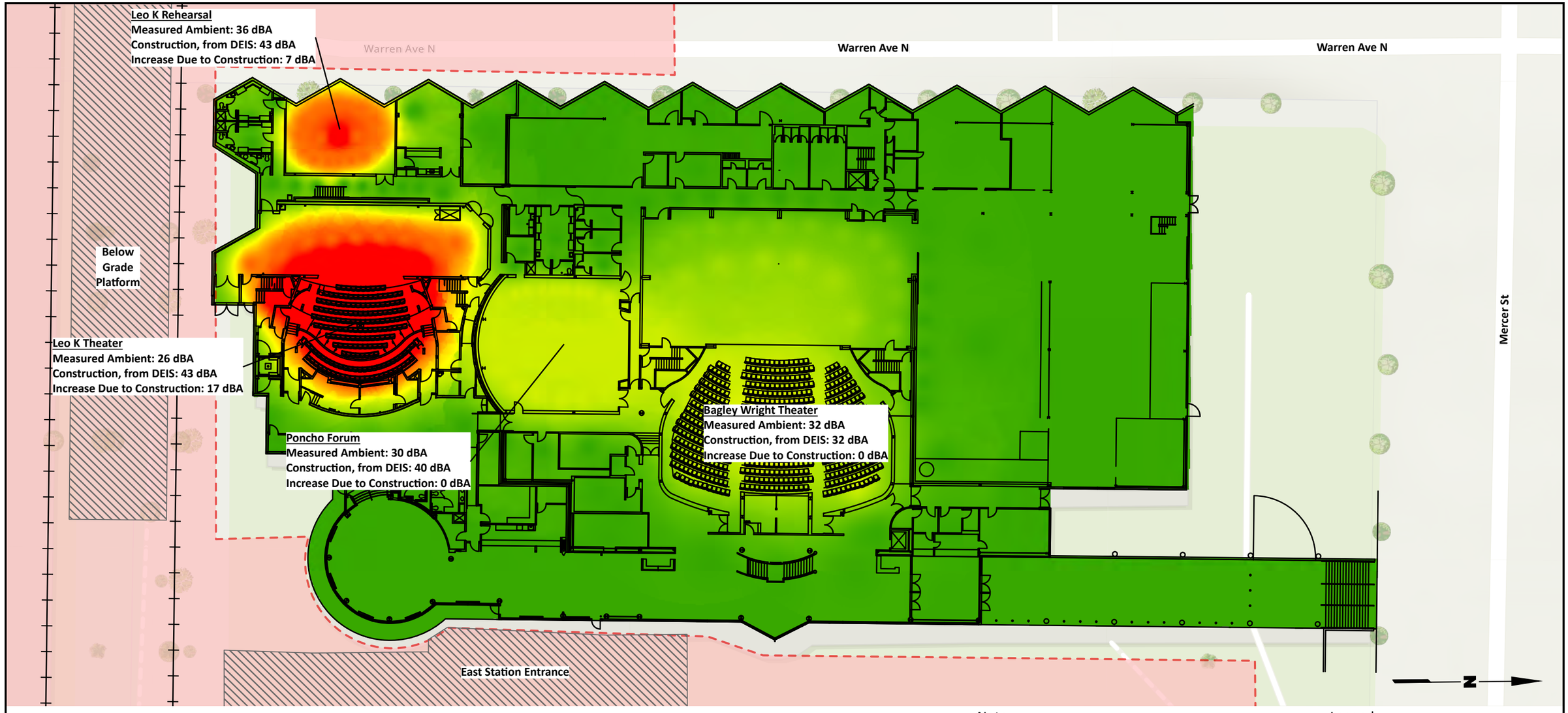
Sound Transit WSBLE DEIS Seattle Rep Seattle, Washington	**Landau Ambient Noise Measurements at Seattle Rep**	Figure 2

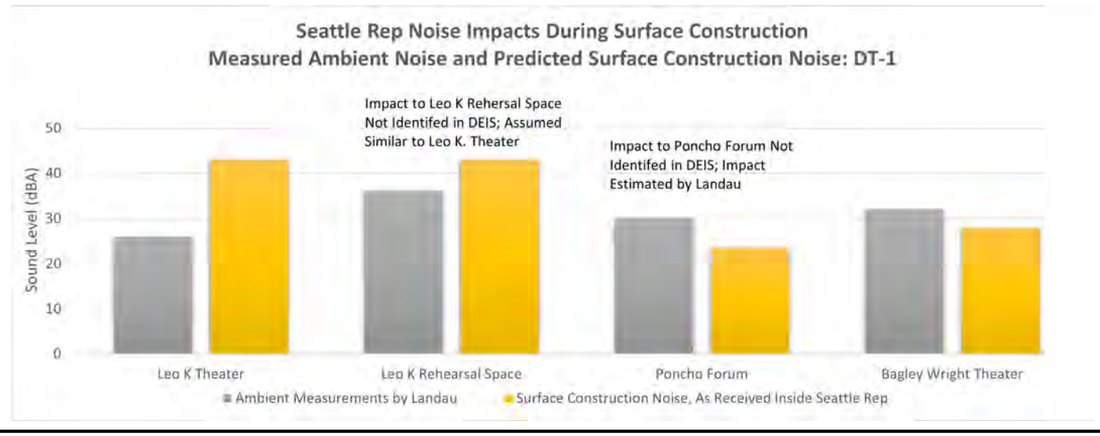
LANDAU ASSOCIATES


Seattle Rep Existing Vibration Levels (VdB) in Sensitive Rooms
January - March 2022
Leo K. Auditorium
Poncho Forum
Bagley Wright Auditorium (Audience Area)
Bagley Wright Auditorium (Front of Stage)
Leo. K. Rehearsal Space
Vibration Decibels (VdB)
85
80
75
70
65
60
55
50
45
40
35
46 VdB
47 VdB
48 VdB
48 VdB
50 VdB
0:00 0:01 0:03 0:05 0:07 0:09 0:11 0:12 0:14 0:16 0:18 0:20 0:22 0:24 0:25 0:27 0:29 0:31 0:33 0:35 0:37 0:38 0:40 0:42 0:44 0:46 0:48 0:49 0:51 0:53 0:55 0:57 0:59 1:01 1:02 1:04 1:06 1:08 1:10 1:12 1:14 1:15 1:17 1:19 1:21 1:23 1:25 1:26 1:28 1:30 1:32 1:34 1:36 1:38 1:39 1:41 1:43
Relative Time (hh:mm)
Total Vibration Level (VdB)
Average Vibration Level (VdB)

LANDAU ASSOCIATES

Sound Transit WSBLE DEIS Seattle Rep Seattle, Washington	**Landau Ambient Vibration Measurements at Seattle Rep**	Figure 3




Seattle Rep Noise Impacts During Surface Construction
Measured Ambient Noise and Predicted Surface Construction Noise: DT-1
Impact to Leo K Rehersal Space Not Identifed in DEIS; Assumed Similar to Leo K. Theater
Impact to Poncho Forum Not Identifed in DEIS; Impact Estimated by Landau
Sound Level (dBA)
50
40
30
20
10
0
Leo K Theater
Leo K Rehearsal Space
Poncho Forum
Bagley Wright Theater
Ambient Measurements by Landau
Surface Construction Noise, As Received Inside Seattle Rep

Note

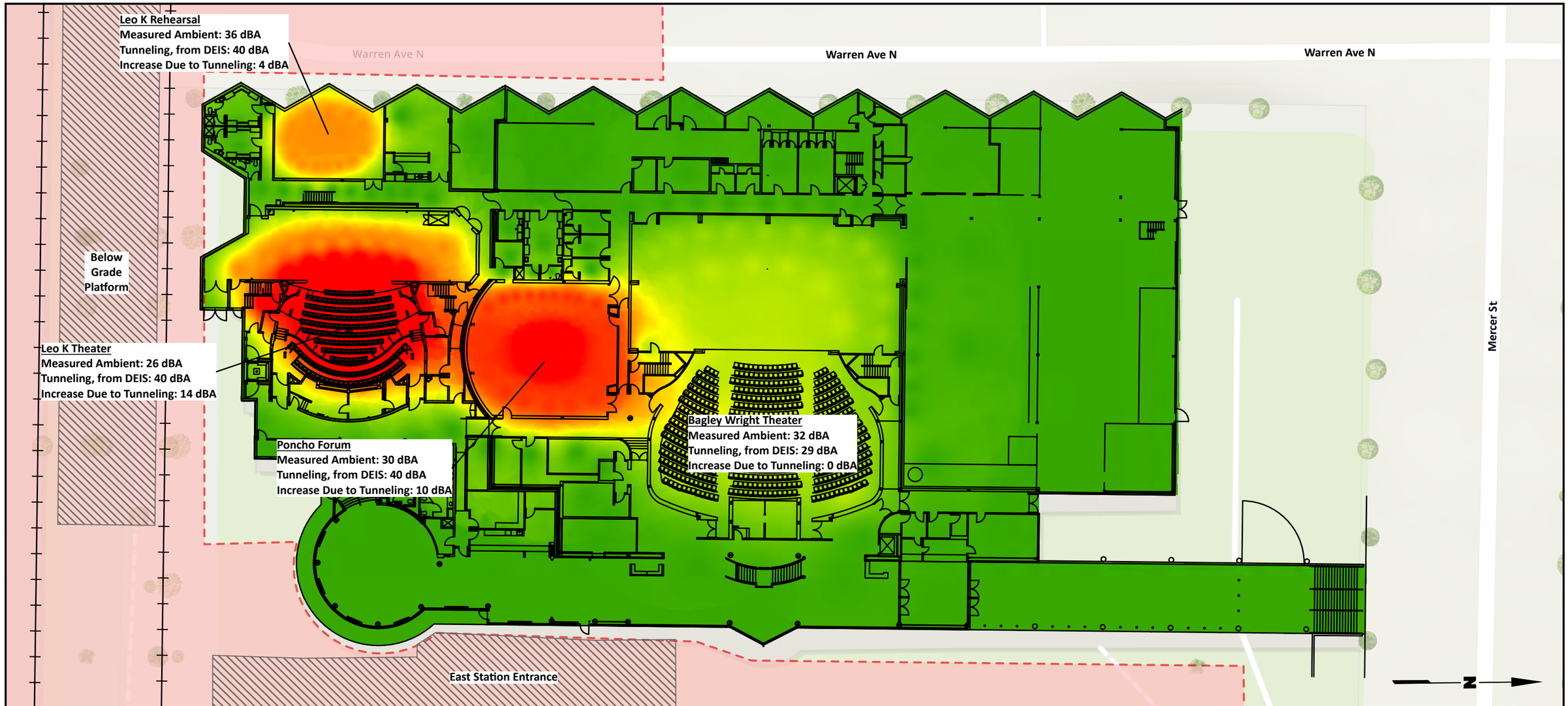
1. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.

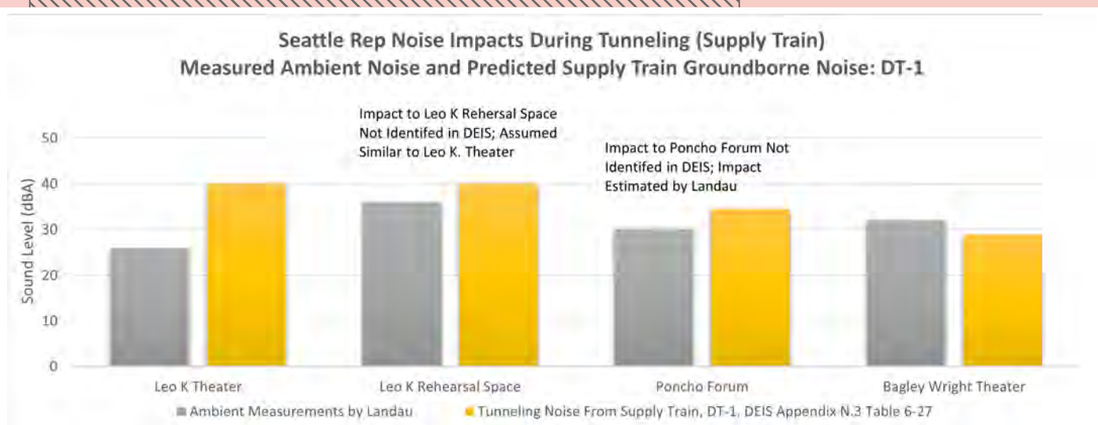
Legend

- DT-1 Tracks
- DT-1 Platform and Stations
- DT-1 Construction Areas

LANDAU ASSOCIATES

Sound Transit WSBLE DEIS Seattle Rep Seattle, Washington	**Surface Construction Noise Impact, DT-1**	Figure 4




Seattle Rep Noise Impacts During Tunneling (Supply Train)
Measured Ambient Noise and Predicted Supply Train Groundborne Noise: DT-1
Impact to Leo K Rehersal Space Not Identifed in DEIS; Assumed Similar to Leo K. Theater
Impact to Poncho Forum Not Identifed in DEIS; Impact Estimated by Landau
Sound Level (dBA)
50
40
30
20
10
0
Leo K Theater
Leo K Rehearsal Space
Poncho Forum
Bagley Wright Theater
Ambient Measurements by Landau
Tunneling Noise From Supply Train, DT-1, DEIS Appendix N.3 Table 6-27

Note

1. *Predictions of groundborne noise from tunneling at Bagley Wright Theater not provided in DEIS, estimate based on difference in operational groundborne noise estimates between Leo K Theater and Bagley Wright Theater.
2. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.

Legend

- DT-1 Tracks
- DT-1 Platform and Stations
- DT-1 Construction Areas

LANDAU ASSOCIATES

Sound Transit WSBLE DEIS Seattle Rep Seattle, Washington	**Tunneling Noise Impact, DT-1**	Figure 5

Leo K Rehearsal
Measured Ambient: 36 dBA
Operation, from DEIS: 48 dBA
Increase Due to Operation: 12 dBA

Warren Ave N

Warren Ave N

Warren Ave N

Below Grade Platform

Leo K Theater
Measured Ambient: 26 dBA
Operation, from DEIS: 48 dBA
Increase Due to Operation: 22 dBA

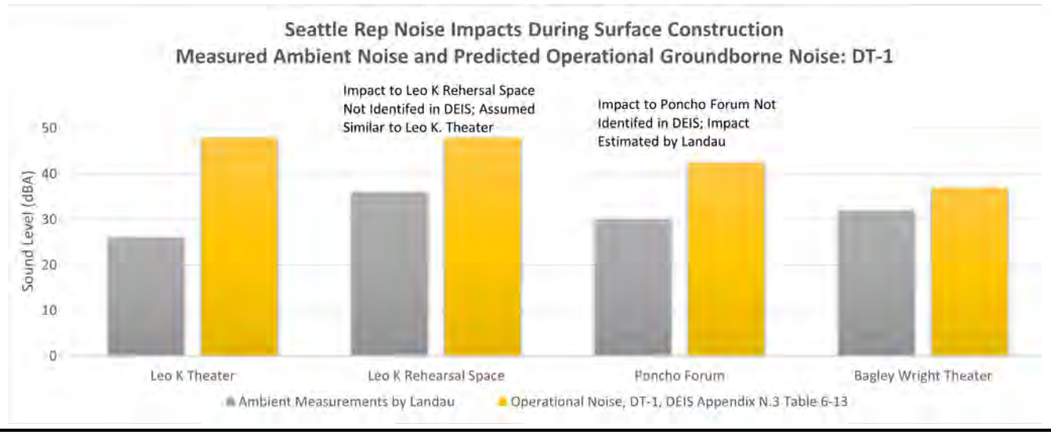
Poncho Forum
Measured Ambient: 30 dBA
Operation, from DEIS: 43 dBA
Increase Due to Operation: 13 dBA

Bagley Wright Theater
Measured Ambient: 32 dBA
Operation, from DEIS: 37 dBA
Increase Due to Operation: 5 dBA

Mercer St

East Station Entrance

N


Seattle Rep Noise Impacts During Surface Construction
Measured Ambient Noise and Predicted Operational Groundborne Noise: DT-1
Impact to Leo K Rehersal Space Not Identifed in DEIS; Assumed Similar to Leo K. Theater
Impact to Poncho Forum Not Identifed in DEIS; Impact Estimated by Landau
Sound Level (dBA)
50
40
30
20
10
0
Leo K Theater
Leo K Rehearsal Space
Poncho Forum
Bagley Wright Theater
Ambient Measurements by Landau
Operational Noise, DT-1, DEIS Appendix N.3 Table 6-13

Note
1. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.

Legend
- DT-1 Tracks
- DT-1 Platform and Stations
- DT-1 Construction Areas

LANDAU ASSOCIATES

Sound Transit WSBLE DEIS Seattle Rep Seattle, Washington	**Operational Noise Impact, DT-1**	Figure 6

SCIDpda

December 9, 2024

Lauren Swift
Central Corridor Environmental Manager
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Sent via email to lauren.swift@soundtransit.org

Dear Ms. Swift,

The Seattle Chinatown International District Preservation and Development Authority (SCIDpda) is a community development organization whose mission is to preserve, promote, and develop the Seattle Chinatown International District (CID) as a vibrant community and unique ethnic neighborhood. We provide housing to close to 1000 residents and commercial spaces to over 50 neighborhood businesses. SCIDpda will celebrate its 50th Anniversary in 2025.

We are stakeholders who live, work, own businesses, and property in the CID Segment of the Ballard Link Extension (BLE) project alignment. We do not claim to represent the entire community within the CID Segment, but we do serve a broad spectrum of resident, business, non-profit, community development, service provider, arts, and cultural interests.

We are pleased to offer our comments today in support of preparing a new draft environmental impact statement (draft EIS) for the BLE project. Since the Sound Transit Board identified a preferred alternative in March 2023, we have been working with Sound Transit to better define what our stakeholders need to support a new light rail project in the CID neighborhood. We support the expansion of the light rail system for the region, and recognize the challenges we all face trying to expand high capacity transit in a densely built environment. We understand the sense of urgency to make timely decisions, while also balancing the needs of the community and our regional economy.

All our previous comments and concerns, submitted during the West Seattle and Ballard Link Extension Draft EIS process remain relevant today. We request Sound Transit review, consider, and respond to those comments during preparation of the new draft EIS.

In addition to addressing our previously submitted comments, we request Sound Transit consider the following when preparing the new draft EIS:

Continue centering historically marginalized voices in your decision-making process. The decision to identify a preferred alternative that locates stations outside the CID has been touted as an attempt to respond to concerns raised by the CID community during the WSBLE

draft EIS process. While many questions remain about the viability of the preferred alternative, we recognize Sound Transit's work as an act of responsiveness to issues raised by the diverse perspectives in our community. It will be important to maintain a commitment to centering and elevating CID community voices through the completion of the project. As Sound Transit continues to press forward, one important way you can demonstrate commitment is to ensure membership has access to new decision makers and executives who have recently been appointed to the agency. We would welcome a direct relationship with the new Executive Director of Capital Delivery and Deputy CEO for Megaproject Delivery, and look forward to opportunities to connect with them and inform their perspectives and decision-making as this project moves forward. Direct access to decision makers within the agency helps to promote our voices and our place in our community.

Consider and acknowledge community preferences in the preferred alternative design and construction. Findings from a summer 2024 community survey of residents and workers in CID and Pioneer Square neighborhoods showed a strong preference for four important concepts related to light rail expansion. Those concepts are:

- CID and Pioneer Square residents are deeply invested long-term partners committed to the vitality, connectedness and accessibility of our neighborhoods.
- Residents appear to be willing to shoulder some inconvenience and short-term disruption of construction to reap the benefits of a well-connected transit system that best serves the neighborhood.
- When given a choice between the preferred alternative and the 4th Avenue/Midtown alternative, residents prefer 4th Avenue by an exceedingly wide margin.
- Residents and workers acknowledge that the preferred alternative will bring the possibility of development opportunities and activity to an un-activated part of the city.

Information presented at the November System Expansion Committee meeting showed the substantial risk and difficulty associated with constructing the 4th Avenue station, leaving many to conclude that the option was unlikely to be built. If the 4th Avenue station-- clearly preferred by most in CID and Pioneer Square-- is not the project to be built, then Sound Transit must show how the preferred alternative design and operation will integrate the strongest desired elements of the 4th Avenue station into the project final design.

Plan for substantial, innovative, and early mitigation. As indicated in previous comment letters and submissions, the CID has been disproportionately harmed by decades of past infrastructure projects, creating ongoing deficits in our community. Sound Transit and its partners will need to innovative in approaches to mitigation for the CID community, and should consider early mitigation measures that help the community prepare for what is to come—not

simply endure it when construction happens. Mitigation ideas should be specific and relevant, and should address impacts now and during construction. Mitigation must also address the impact of long-term transit connectivity deficits (like airport access), should they arise resulting from project design.

The SCIDPDA organization will continue to participate in the public process to shape this generational transit investment for our community and the region. We will continue to partner with Sound Transit and the City of Seattle to ensure our community needs and voices are reflected in all elements of the project. We look forward to finding ways to maintain and improve the resilience and vibrancy of our neighborhood as we collectively expand regional high-capacity transit together.

We thank Sound Transit for its continued work in our community as it develops the new draft EIS.

Sincerely,

Jared Jonson

SCIDpda Co-Executive Director

Jamie Lee

SCIDpda Co-Executive Director

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SOUTH LAKE UNION COMMUNITY COUNCIL

OUR VISION

To steward a livable, vibrant, urban neighborhood supporting a diversity of residents of all ages and incomes while driving an innovative local economy and providing rich, cultural community opportunities.

OUR VALUES

Inclusiveness | Integrity | Respect | Transparency | Impartiality

December 9, 2024

Lauren Swift
Central Corridor Environmental Manager
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Draft EIS: Do not overlook TOD at SLU Station. Specific considerations.
SLUCC Supports Downtown Seattle Association letter.

Dear Ms. Swift,

We at the South Lake Union Community Council have been planning for the development of the Ballard Link Extension of ST3 for many years. We are excited for the benefits that this line will bring to the neighborhoods served along the corridor. Our particular interest is in the couplet of stations at Denny/Westlake (the Denny Station) and 7th/Harrison (the SLU Station).

In scoping the Draft EIS, we generally concur with the points raised by the Downtown Seattle Association in their comments on the planning and mitigation necessary to construct this multi-faceted project in a way that brings wins for all. With that said, there is one additional issue that we encourage you to not overlook in your planning. That is the opportunity for Transit Oriented Development (TOD) at the SLU Station location.

We understand that TOD is being planned in the early 10% design for the Denny Station and we welcome this. Our community seeks to support housing for all of our residents, particularly the low-income and workforce residents who are being displaced by the rapid development of higher-end housing units in the neighborhood. We are encouraged by this early planning at the Denny Station site. At the same time, going back to 2010 we have advocated for TOD at the SLU Station site that would likewise encourage the generation of low-income/workforce housing units to recoup what is being lost across the SLU and Uptown Triangle neighborhoods. Attached is an illustration from the 2011 Seattle City Council-recognized *South Lake Union / Uptown Triangle Mobility Plan* that envisions this opportunity on the half block bounded by Harrison St. to the north, Aurora Ave. to the east, Thomas St. to the south, and an alley to the west.

Julie Holland
President
Mirabella

Stacy Segal
Vice President
Seattle Parks Foundation

Geoff Eseltine
Secretary
Cascade People's Center (YMCA)

Paul Wohnoutka
Treasurer
Allen Institute

Josh Anderson
Director
Center for Wooden Boats

Rebecca Bryant
Director
Fred Hutchinson Cancer Center

Kiki Gram
Director
Vulcan Real Estate

Andrea Vanecko
Director
NBBJ

It is understood that at least half of this half-block is undeveloped Washington State department of Transportation property. The other half is a low-rise 1950s era motel property that is currently used as temporary housing under contract with the City of Seattle and King County. Further, we understand that Sound Transit is planning for both properties to be used in the staging and construction of the new SLU Station. We encourage ST to work with WSDOT and related property owners to find opportunities post-station construction to produce TOD that captures the opportunity for low-income/workforce housing, integrated access to multi-modal mobility, and uses that enhance the neighborhood. Please ensure that the scope of the Draft EIS does not overlook this need at the intersection of economic, environmental, and mobility interests.

Thank you,

Julie Holland

Julie Holland
Board President
SLU Community Council

7 CREATE HUBS FOR MODE TRANSFER

T1: THOMAS / HARRISON MOBILITY HUB

T1: Thomas/Harrison Mobility Hub -- This hub would be at the future Aurora Avenue RapidRide Station, between Harrison and Thomas Streets, where regional RapidRide service would meet local transit service. This node also connects with the Lake-to-Bay Loop trail, the Thomas Street Green Street and new east-west bike routes.

INTERIM USE ON WSDOT PROPERTY

Most of the improvements can be implemented ahead of future development; a temporary bike station could be included at the corner to help establish a "Sense of Place"

TRANSIT + TRANSPORTATION

- **A1** Enhanced pedestrian/rider amenities at RapidRide and Metro bus stops
- **A2** Designated bus lanes and priority signals
- **A3** East-west bus service on Harrison Street
- **A4** Shuttle bus stop
- **A5** Transit and community information kiosk

PEDESTRIAN + BICYCLE

- **B1** Activated building edges (cafes, shops, etc)
- **B2** Safe pedestrian crossing with special intersection paving and treatments
- **B3** Wayfinding signs
- **B4** Future transit-oriented development
- **B5** Bike station
- **B6** Thomas Street concept design & Green Street improvements
- **B7** Shared bike/vehicle lane
- **B8** Pedestrian lighting

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Neighborhood with a Sense of Community

Inclusive and diverse

Thriving Arts District

Home to Seattle Center

Great local businesses

Walk, Bike, Bus, Monorail, (and drive)

Diverse and affordable housing

Historic buildings with character

Open space for healthy living

Distinguished cultural and philanthropic organizations

December 9, 2024

Lauren Swift
Central Corridor Environmental Manager
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Sent via email to lauren.swift@soundtransit.org

Dear Ms. Swift,

Thank you for the opportunity to provide comments on the Ballard Link Extension (BLE) project scoping for a new Draft Environmental Impact Statement. The Uptown Alliance is a community-led nonprofit organization that was established in 1999 with the goal of creating and maintaining a more sustainable, civil and enjoyable environment for residents, businesses and visitors. Our community also embraces, supports and helps guide new development that is helping grow Uptown into a vibrant, inclusive, active and exciting place for all.

The Uptown Urban Center is proposed to host two BLE light rail stations within our planning area. See attached map. The Seattle Center Station's preferred alternative station on Republican (and its associated west portal) are wholly within the heart of Uptown. The South Lake Union Station has half of its ridership walkshed and one entrance in the easter portion of Uptown, known as the Uptown Triangle area (from 7th to 5th and Denny to Mercer). We have followed BLE issues for many years and have appreciated the very helpful working relationship with Sound Transit staff. We are experts on the past, present and future of our neighborhood. We are here as a resource and to help advance good planning and good outcomes for all.

We are supportive of BLE's planned light rail service with improved mobility and associated smart growth for our region. We seek to better understand the impacts, interruptions and mitigations needed to maintain livability, and business vibrancy through a very lengthy construction process. The previous information in the DEIS and outreach process from Sound Transit has not adequately provided enough definition, explanation, and detail on the scope of the project and its subsequent construction impacts. We request the following topics be addressed in the new DEIS:

General:

- Sound Transit should not wait until the final EIS to propose mitigation when there is no opportunity for public comment. This is a new draft EIS and Sound Transit has advanced new preliminary engineering on the preferred alternative at both station locations in Uptown since the original DEIS. There is now more information to identify propose impacts and mitigation.
- Many stakeholders in our community have expressed confusion and say they are unsure of the extent of the project and its construction in Uptown. The DEIS needs to be more comprehensive and consolidate the information about this station. Additionally, the outreach process needs to be more thorough than in the past.
- Future outreach efforts should also always include qualified engineering team members that can speak to how program and design decisions are made and to the means and methods of construction.
- The construction of the Seattle Center/Republican Station, the tunnel transition trench, the tunnel portal will require hauling of station excavation and tunnel spoils for as long as 6+ year. That makes these impacts, in effect, permanent to the residents and property owners adjacent. ST should work with Uptown Alliance to understand and identify the economic impacts and mitigations to address those accordingly.
- Previous DEIS and ST presentation drawings, diagrams and illustrative documents did not adequately indicate, in a manner understandable to the lay person, the scope and impacts of the project. We request Sound Transit present information that is easily understandable to the public. A good example of what we are requesting is like the documents that were resented to the ST board in recent November meetings regarding the CID station options which were significantly more detailed and were more legible to the public than were used in the original DEIS. That update used public friendly 3-D visualizations showing how the project is constructed in phases and when complete. This same approach and technique must be used in the future for the Seattle Center and SLU Stations as part of the DEIS.

West Republican Street, the Tunnel Trench & Tunnel Portal

We understand that 5.5 blocks of W. Republican Street (from Queen Anne Avenue to the hillside above Elliott Avenue W.) will effectively be an open cut and cover excavation, as much as 110' deep and as wide or wider than the right of way. The extent of excavation extends well beyond the station box/platform itself and includes an open trench transition from the station to a tunnel portal on the hillside above Elliott Avenue. We also understand that the previous DEIS indicated that five north/south avenues will be closed for some time during construction. Furthermore, 1st Ave West, 2nd Ave West and 4th Ave West are proposed to be closed for multiple years of construction.

- Please ensure this information is presented in a manner understandable to the lay person, the extensiveness of this undertaking. The new DEIS should include phase visualizations similar to the recent November ST Board Illustrations for the CID.
- Mitigations to traffic and bus impacts and pedestrian/bike mobility/safety, such as connecting **all** N/S streets across the Republican Street trench should be brought forward

in the schedule as early as reasonably possible and not wait for full excavation of the trench and construction of the station. The DEIS should describe how access to events at Seattle Center will be impacted and the subsequent mitigation needed.
- Provide conceptual illustrations of the street and private property improvements when the trench is covered in this corridor and the street grid is re-established.
- See the attached PDF for more information.

Portal:

We understand that approximately 70% of the bored tunnel excavation materials will be hauled out of the west portal area in Uptown. The Portal also appears to daylight within a steep slope critical area hillside.

- Define where and how tunnel excavation soils will be stored, staged and loaded at this end of the project. Map the impacted properties and proposed mitigations. Previous DEIS work did not fully delineate potential property acquisitions or impacts at W Republican of Elliott West.
- Map haul routes and destination of excavation materials and create a schedule for the DEIS.
- Delineate the schedule and the extent of dust, noise, and traffic created and mitigated during construction.
- Identify and describe how the steep slope critical area will be stabilized and how surrounding properties will be protected.
- Create conceptual drawings showing the exposed tunnel portal face, architectural features and potential public benefits and historic/cultural/contextual references where the public might see and experience those elements.

Elliott Avenue West:

The BLE elevated guideway from the tunnel portal northward to Smith Cove/Expedia crisscrosses Elliott Ave W. several times on columns and structural “bents” straddling travel lanes.

- Coordinate the evolving design and schedule of the new Elliot West Wet Weather Station project with the conceptual BLE project components.
- Provide conceptual 3D illustrations of both projects together so the public can better understand the interrelationship and potential conflicts and impacts.

Seattle Center Station:

- The New DEIS needs to comprehensively consolidate the information about this station.
- The primary entrance for Seattle Center patrons for this station is on Republican, Previous design drawing showed a very constrained sidewalk condition. The DEIS should investigate configuring the head house to create an arrival plaza to accommodate large event surge crowds.

- Consider surge events when there is a significant spike in demand for transit service or station usage. We believe this is a significant deficiency in the DEIS and must be considered during the planning and design of a location such as Seattle Center/ Uptown station. A passenger flow/crowd management plan that identifies how crowds will disperse after large events throughout the campus and neighborhood to reach station entrances should be developed in conjunction with Seattle Center and SDOT to determine what pedestrian improvements are necessary for adequate queuing and safety so that the demands for crowd events can be met. Additionally, analysis is needed to determine the train movements to establish the capacity to load surge crowds.
- See the attached PDF for more information.

Property Takings & Acquisitions:

The Republican West station needs to have all property impacts well described and documented.

- Thoroughly map and document targeted acquisition properties and outline the key decision making and rationale process for selecting each property.
    - As you are aware, this issue is of great concern to property owners and businesses and will create a great deal of anxiety. The more information you can share the better off everyone will be. There are many small and large businesses that will be impacted and uncertainty and speculation will create havoc, so the more everyone understands early, the better.
    - Some of the larger properties include The Mediterranean Inn and SIFF Uptown. The Inn brings many visitors to the Uptown neighborhood and there is concern about the loss of revenues to small businesses afforded by this group. The SIFF Uptown Theater property is also an important cultural asset in our community, so understanding all impacts to it will be important including noise & vibration.
    - Smaller businesses are equally important and contributing factors in making this a vibrant neighborhood. Closing a small business is potentially devastating to these small business owners so the more we all understand, the better off we will all be.
    - We will also be able to use this data to work with the city as the neighborhood comprehensive plan process will be occurring at the same time we are analyzing the station impacts. This information will allow us to better plan for our future.
- Describe the process and methodology for determining fair compensation for acquired properties and mitigations to losses for existing business displaced by the BLE project.
- The DEIS should identify how, when and where Sound Transit will dispose of residual staging property and describe rationale for holding staging properties beyond construction timeframes. TOD properties should start disposition earlier to allow multi-year entitlements and permit processes to proceed in parallel with construction staging and train commissioning. Many past Sound Transit TOD properties delayed the RFP/disposition process well beyond the functional need for staging. This creates extended and likely unnecessary burdensome impacts to the community. If disposition is delayed beyond staging needs, the DEIS needs to describe mitigations to the community and adjacent property owners.
- See the attached PDF for more information.

Property Impacts (Adjacent Property, Not Acquired by Sound Transit):

For all the items above:

- Delineate how adjacent properties will maintain or lose vehicle or pedestrian access to public rights of ways during construction and subsequent mitigations.
- Delineate how and where adjacent properties will require utility access and service modifications during different stages of the construction and subsequent mitigations.
- Describe the process and methodology for determining economic losses/compensation due to lost tenancy/occupancy due to construction periods and subsequent mitigations.

Transit Oriented Development Opportunities

- Examine and provide a side-by-side analysis and visual depiction between Uptown alternatives showing the land that is anticipated to be required by Sound Transit that could be available for disposition after the project is completed.
- Uptown strongly encourages TOD housing that supports Uptown's Guiding Principles for development of a diverse range of housing types and affordability levels to meet the growing demands of families and singles, workers and retirees, local arts and culture workforce.
- Please provide graphics to show opportunities to create public plazas and pedestrian corridors to serve the neighborhood with festival streets & community gathering spaces.

South Lake Union Station

- Analize the impacts of having both this station and Seattle Center (West Republican Station) under construction at the same time. Sound Transit needs to work closely with both South Lak Union and Uptown, as well as the Seattle Center to study mitigation options and impacts north/south traffic on each side of Seattle Center between 5th Ave N and 4th Ave W. while maintaining safe pedestrian and bike access during construction.
- Harrison Street will become the primary desire line from the SLU station, the E-line Rapid Ride Bus network and the new Route 8 Bus line to Seattle Center. The DEIS should evaluate the impacts and opportunities for pedestrian improvements needed to enhance safety, livability and economic vibrancy of the corridor.
- Thomas Street pedestrian and bike improvements are nearly finished. Carefully consider interruptions and changes to this corridor during and after construction.
- Incorporate, consider and build upon the new design/construction of Memorial Stadium and the surrounding streets and associated Seattle Center improvements, which are planned to be completed prior to BLE construction.
- We have not yet seen the new tunnel geometry between the SLU station with the latest Denny North changes to the station position. The DEIS needs to evaluate and document this and describe any subsequent impacts to the Uptown and Seattle Center side of the SLU station area. We have also not seen documentation on the revised tunnel geometry

through Seattle Center. The DEIS needs to describe and examine alignment options and evaluate the impacts to Seattle Center resident organizations, The Gates Foundation and other property owners in Uptown, including noise and vibration during construction and ongoing LRT operations.

Thank you for addressing these matters in the new Draft EIS. We look forward to working with you on all these issues. We believe we can find ways to minimize negative construction impacts leading to exciting new positive transportation options in the future

Please contact our transportation chair, Matt Roewe at matt@roewe.works if you have any questions or comments.

Sincerely,

Uptown Alliance Executive Committee Members:

Rick Hooper, Board Co-Chair

Lisa Powers, Board Co-Chair

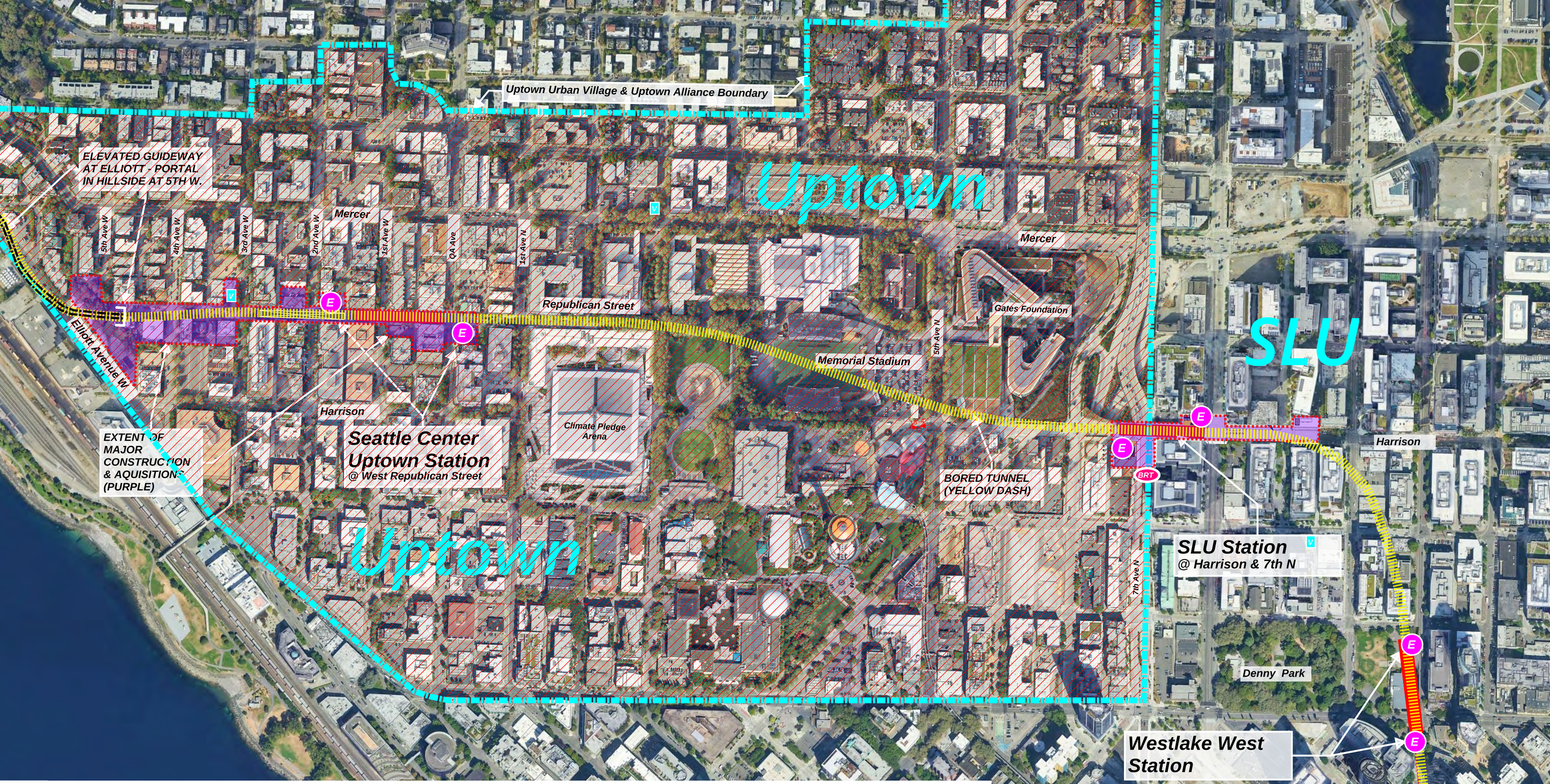
Maria Barrientos, Land Use Committee, Co-Chair

Mercedes Fernandez, Land Use Committee, Co-Chair

Matt Roewe, Transportation Committee, Chair

Cc: Dow Constantine, King County Exec., ST Board Chair, dow.constantine@kingcounty.gov
Bruce Harrell, Mayor of Seattle, bruce.harrell@seattle.gov
Adiam Emery, Deputy Mayor of Seattle Adiam.Emery@seattle.gov
Bob Kettle, Seattle City Council, Robert.kettle@seattle.gov
Dan Strauss, Seattle City Council, Dan.strauss@seattle.gov
Marshall Foster, Seattle Center Director, marshall.foster@seattle.gov
Sara Maxana, Sound Transit Program Director, SDOT, sara.maxana@seattle.gov
Julia Levitt, Strategic Advisor, Seattle Center Redevelopment, Julia.levit@seattle.gov
Jane Zalutsky, E.D. Seattle Center Foundation, jejzalutsky@seattlecenter.org

Enclosures: DEIS Diagram Mark Ups (4 pages)



North Downtown Light Rail Stations & Tunnel Alignment

NORTH

UPTOWN ALLIANCE MAP CREATED 12/9/24 - BASED ON MULTIPLE PUBLIC DOCUMENTS FROM SOUND TRANSIT, 2022- 2023 PREFERRED ALTERNATIVE

E = STATION ENTRANCE

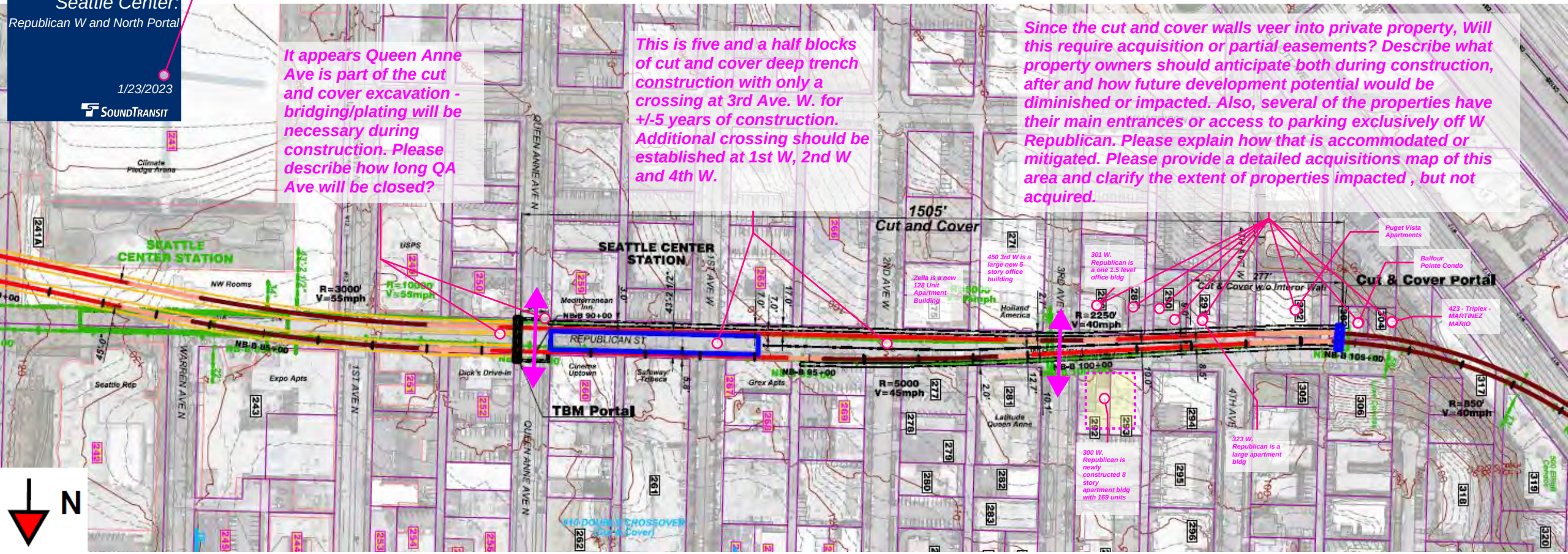
West Seattle and Ballard Link Extensions

Seattle Center:
Republican W and North Portal

1/23/2023

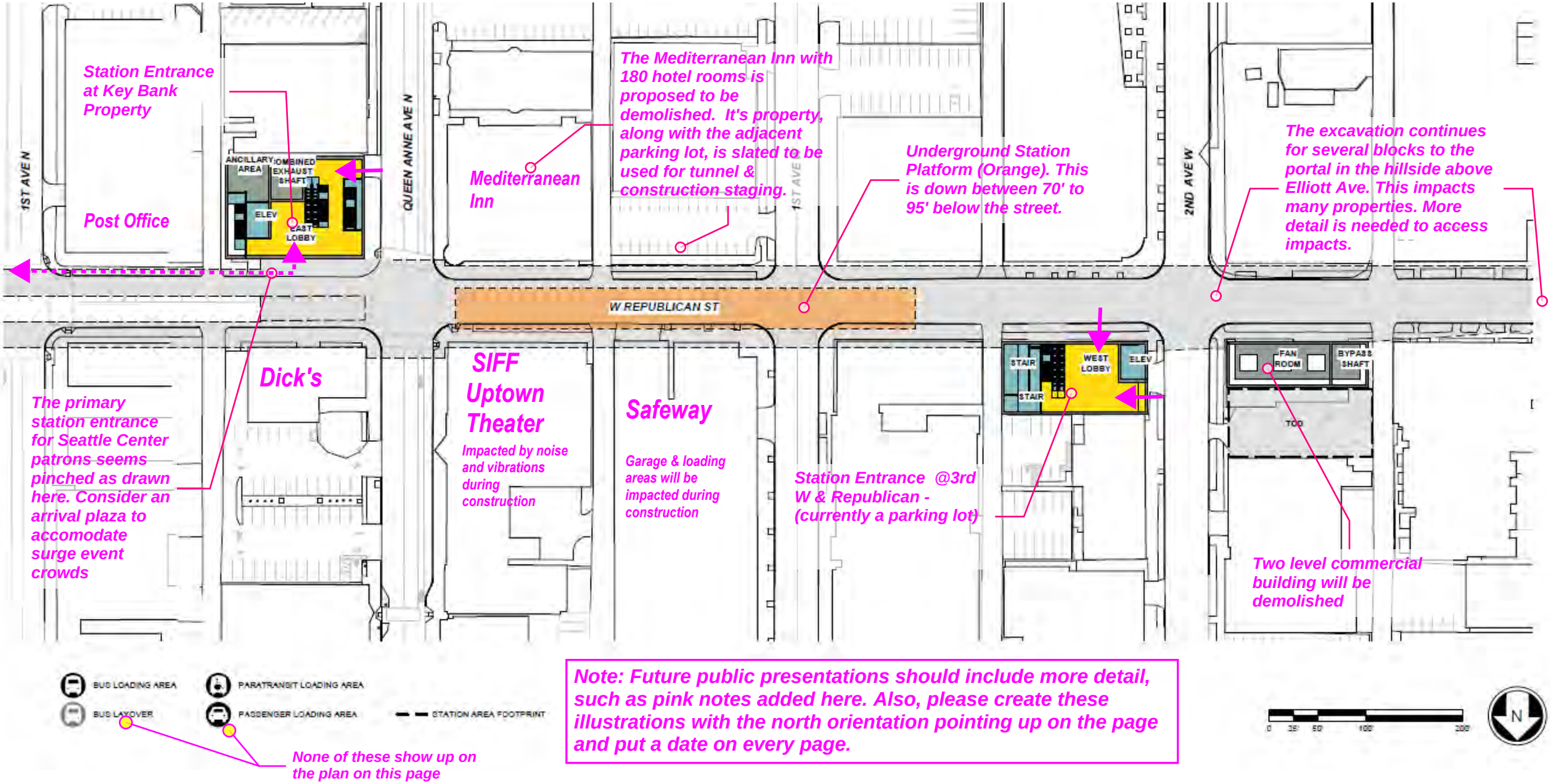
SOUNDTRANSIT

Uptown Alliance Questions and mark-up (in italic pink/red) of the following pages from the 1/23/23 ST presentation on the Republican West Station Option


It appears Queen Anne Ave is part of the cut and cover excavation - bridging/plating will be necessary during construction. Please describe how long QA Ave will be closed?
This is five and a half blocks of cut and cover deep trench construction with only a crossing at 3rd Ave. W. for +/-5 years of construction. Additional crossing should be established at 1st W, 2nd W and 4th W.
Since the cut and cover walls veer into private property, Will this require acquisition or partial easements? Describe what property owners should anticipate both during construction, after and how future development potential would be diminished or impacted. Also, several of the properties have their main entrances or access to parking exclusively off W Republican. Please explain how that is accommodated or mitigated. Please provide a detailed acquisitions map of this area and clarify the extent of properties impacted , but not acquired.
SEATTLE CENTER STATION
SEATTLE CENTER STATION
1505' Cut and Cover
Cut & Cover Portal
Cut & Cover w/o Interior Wall
TBM Portal
REPUBLICAN ST
QUEEN ANNE AVE N
1ST AVE W
2ND AVE W
3RD AVE W
4TH AVE W
WARREN AVE N
1ST AVE N
R=3000' V=55mph
R=10000 V=55mph
R=5000 V=45mph
R=2250' V=40mph
R=850' V=40mph
NB-B 90+00
NB-B 95+00
NB-B 100+00
NB-B 105+00
Climate Pledge Arena
NW Rooms
Mediterranean Inn
Expo Apts
Seattle Rep
Dick's Drive-in
Cinema Uptown
Safeway Tribeca
Grex Apts
Holland America
Latitude Queen Anne
Zella is a new 128 Unit Apartment Building
450 3rd W is a large new 5 story office building
301 W. Republican is a one 1.5 level office bldg
300 W. Republican is newly constructed 8 story apartment bldg with 169 units
323 W. Republican is a large apartment bldg
Puget Vista Apartments
Balfour Pointe Condo
423 - Triplex - MARTINEZ MARIO
N

Republican West

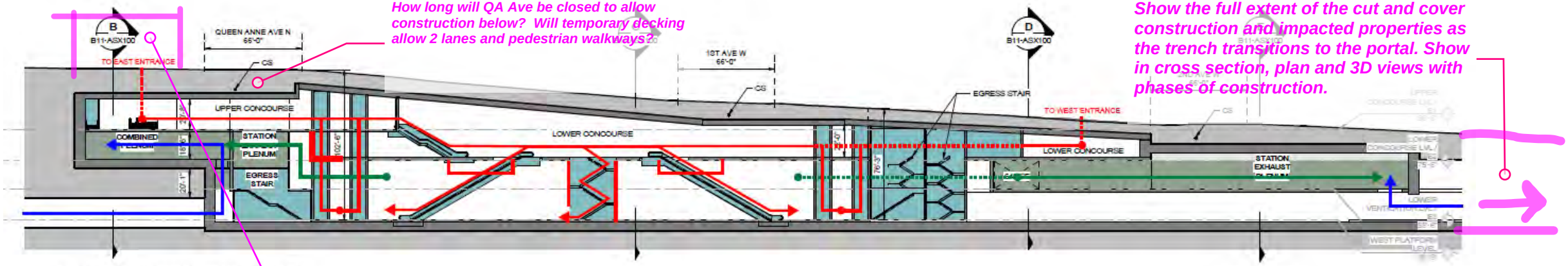
SOUNDTRANSIT


Station Entrance at Key Bank Property
Post Office
1ST AVE N
ANCILLARY AREA
COMBINED EXHAUST SHAFT
ELEV
EAST LOBBY
QUEEN ANNE AVE N
Mediterranean Inn
The Mediterranean Inn with 180 hotel rooms is proposed to be demolished. It's property, along with the adjacent parking lot, is slated to be used for tunnel & construction staging.
1ST AVE
Underground Station Platform (Orange). This is down between 70' to 95' below the street.
2ND AVE W
The excavation continues for several blocks to the portal in the hillside above Elliott Ave. This impacts many properties. More detail is needed to access impacts.
W REPUBLICAN ST
The primary station entrance for Seattle Center patrons seems pinched as drawn here. Consider an arrival plaza to accomodate surge event crowds
Dick's
SIFF Uptown Theater
Impacted by noise and vibrations during construction
Safeway
Garage & loading areas will be impacted during construction
STAIR
STAIR
WEST LOBBY
ELEV
Station Entrance @3rd W & Republican - (currently a parking lot)
FAN ROOM
BYPASS SHAFT
TOD
Two level commercial building will be demolished
BUS LOADING AREA
BUS LAYOVER
PARATRANSIT LOADING AREA
PASSENGER LOADING AREA
STATION AREA FOOTPRINT
None of these show up on the plan on this page
Note: Future public presentations should include more detail, such as pink notes added here. Also, please create these illustrations with the north orientation pointing up on the page and put a date on every page.
0
25'
50'
100'
200'
N

SoundTransit

How long will QA Ave be closed to allow construction below? Will temporary decking allow 2 lanes and pedestrian walkways?

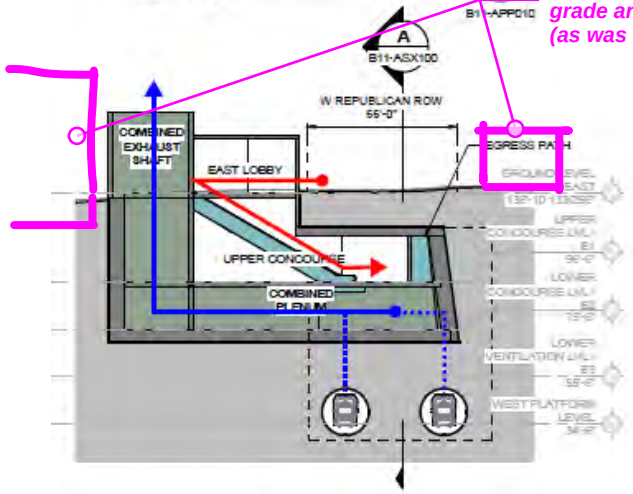
Show the full extent of the cut and cover construction and impacted properties as the trench transitions to the portal. Show in cross section, plan and 3D views with phases of construction.



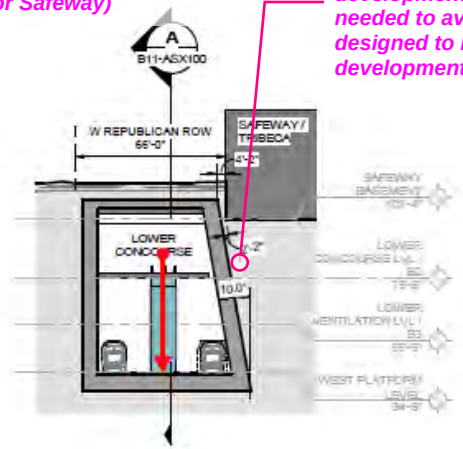
OVERALL SECTION LOOKING SOUTH (A B11-ASX100 / B11-APP010)
SCALE: 1" = 30'-0"

Show and label the relationship to adjacent buildings and their below grade areas at all cross section views (as was done for Safeway)

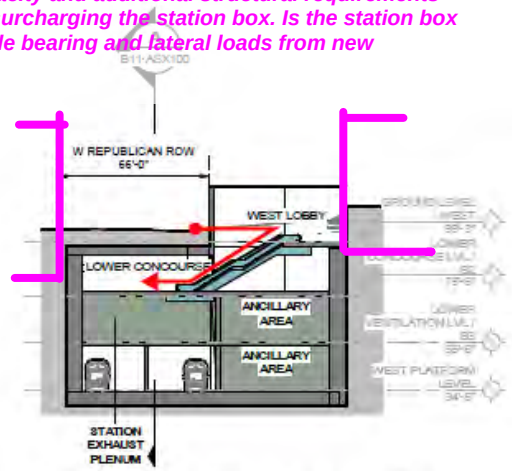
Will properties need to be acquired by ST where the tapered station box goes under private property? If not, how are property owners compensated for impacts during construction and for the loss of development capacity and additional structural requirements needed to avoid surcharging the station box. Is the station box designed to handle bearing and lateral loads from new development?



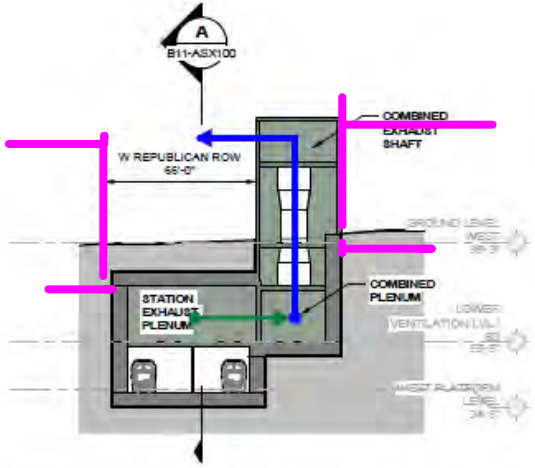
E/W SECTION AT EAST HEAD HOUSE (B B11-ASX100 / B11-APP010)
SCALE: 1" = 30'-0"



STATION CROSS SECTION AT SAFEWAY (C B11-ASX100 / B11-APP010)
SCALE: 1" = 30'-0"



E/W SECTION @ WEST HEAD HOUSE (D B11-ASX100 / B11-APP010)
SCALE: 1" = 30'-0"



E/W SECTION @ WEST VENTILATION BLDG (E B11-ASX100 / B11-APP010)
SCALE: NOT TO SCALE

LEGEND
- PUBLIC CIRCULATION
- TUNNEL VENTILATION
- BYPASS VENTILATION
- STATION EXHAUST

0 15' 30' 60' 120'

Republican West

SOUNDTRANSIT

Appendix E

Public Comments

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Date received	Communication	Contacts
10/24/2024	The station at 14th/15th and Market has an issue with 15th St impacting the catchment area. A shallow pedestrian tunnel from the station to 20th would alleviate that and expand ridership to the dense part of Ballard to the West. A moving sidewalk would be an A+ transit upgrade but not required.	James Bushell
10/24/2024	The path forward should be the quickest one. This project is already 2 decades beyond needed, so waiting another decade (or more!) is preposterous. If elevated is faster to approve and build than a tunnel, then do that. Just get it done!	Athena B
10/24/2024	There is no need to continue studying the CID North/South plan. The community has shown outstanding support for both the 5th ave and 4th ave alternatives which should be the only ones to move forward. Shallow, mid, and deep are all viable for further study. In Ballard, the elevated 14th plan is likely best but studding the others is fine. Similarly, the consolidated Denny and SLU option should not move forward. The voters expect two stations, not one and construction impacts have been given too much importance in this 100+ year decision. The priority should be low cost, fast construction building the best system possible for our great grandchildren.	Erik Nielsen
10/24/2024	I cannot possibly state how imperative the 4th Avenue alternatives are to our city's future. Any additional cost is worth it in the long run and frankly I would only want my tax dollars going to one of the 4th Avenue alternatives. We can't afford to get this choice wrong. Seattle DESERVES a transit hub with connections and transfers as easy as LA's Union Station. Unless we're moving Sounder and Amtrak, building a new streetcar, and fundamentally restructuring the entire local AND regional bus network, Dearborn North/South is NOT an option. It is absolutely ridiculous that this great city is being teased with such staggering mediocrity. It has got to be 4th. The end.	Daisy Quinn
10/24/2024	Please select the 4th avenue alignment for this portion and really maximize the activation plan of the area around Union Station. The north and south of CID alignment will needlessly add transfers for riders between light rail lines, as well Amtrak and sounder, meaning that some will opt for other modes altogether which is at odds with the goal of building light rail in the first place. Please do the right thing, not the easy thing here and let's build something the next several generations will benefit from.	Efrain Hudnell
10/24/2024	I am one of the artist tenants at Inscape and the link extension contruction will directly affect my working conditions as an artist and a small business. There are over 100 studios and even more tenants - I share a studio with 2 other artists. The ongoing noise and sound pollution will contribute to the displacement of Seattle artists, all of us already undervalued by the city for our cultural contributions to the community. Accomodations must be made for the tenants by funding provided to protect the infrastructure and historical/cultural impact of the building. Air purifiers, noise reducing windows and other investments are costs that tenants cannot burden on their own, with many tenants including myself being threatened with being priced out of the community. All considerations must be made to preserve the arts community in the Chinatown International District. Please hear the many voices of the current tenants of Inscape and consider the future of the arts and culture of Seattle by investing in our ability to flourish.	Bailee H
10/24/2024	Please make sure the transfer at CID is as seamless as possible	Oliver Chen

Date received	Communication	Contacts
10/24/2024	I am concerned about the impact of the preferred alternative Dearborn station on the Inscape building, where I am one of many artists renting space for my business. This is especially a concern for me during the long construction time... vibrations, dust and noise could make working in our studios difficult or even impossible, especially since our historic building does not have double paned windows or modern filtration systems. I hope you realize that single building is home to ~100 small businesses who may need mitigation during your construction. The bigger picture also confuses me - I understand that reworking an existing station costs money, but it seems bad for system usability to add a 3rd station in the neighborhood at Dearborn, instead of facilitating easy transfers at Stadium and/or King Street. I do see some benefits to the station coming to Dearborn - it's not all negative - but I really hope you prioritize supporting the existing artist scene. The city is a rough place for artists these days and I am worried Sound Transit will inadvertently make that worse. But it could be amazing - you could activate our south end of the CID and include additional arts facilities in whatever developments accompany the new station! Please remember our community in your planning.	Irene Nelson
10/24/2024	Complex lang span structures or structures in urban environment are expensive to construct and disruptive to repair. It would be ideal that they are designed for 100-year service with minimal and predetermined maintenance. This thought must be set prior to even developing the RFP and must certainly be listed in the RFP if owners want the structure to last 100 years. If the structure need to be replaced prematurely, it not only increases the cost but also increases the carbon footprint and taxes the environment. Multiply this by the ten of thousands of structures we build, it can be very expensive both monetarily and environmentally. Would there be a requirement for corrosion control plan to achieve 100-year service life design? If yes, would the owner list it as a requirement of the project?	Siva Venugopalan
10/25/2024	I think this is all great and encourage the prime focus being on most efficiently moving the most amount of people to the most places they want to go. I.E. the SLU station, that doesnt look to close to where the large employers actually are. Im, not saying cater to Amazon or whatever but my interest is getting so many cars off our limited road space if they dont have to be there.	Gabriel Lungstrom
10/25/2024	As a business owner in both Pioneer Square and the International district, I am excited to see more transit serving those areas. However, I would prefer the 4th ave extension, as it has the least impact on small businesses in the area.	Joseph Kent
10/25/2024	Please build the preferred alternative with a tunnel under Salmon Bay and a station at 15th Ave. If we can't build this alternative then we should not build anything at all. Building an elevated bridge because it costs less is a terrible short term solution to a long term problem. Thanks, John	John Walters
10/25/2024	I lease an art Studio at the Inscape Building at 815 Seattle Blvd South. (the old INS building). The line is proposed to go alongside our building. I would like make sure that those of us who make our livelihood in this area not be displaced or disrupted too much. Inscape is an established community of art in the city and needs to be maintained.	Jennifer Towner

Date received	Communication	Contacts
10/25/2024	The SODO/Chinatown station must be a 4th avenue option. The interchange been lines and King Street station is essential both for Seattle's future and quality of transit. The issue is speed and reliability which is what transit needs if it's a fairer, lower cost, and more environmental alternative to cars Any walking time between stations puts the preference to driving. I lived in Montreal which had a blue, green and orange metro lines. Each has two points of intersection. When one line fails you can take the other line. The lines do fail or there's a security incident. You don't want people to be stuck. It gets extremely crowded and unsafe. For reliability and speed of the lines which is equality factor in transit we need two high quality intersections between the two downtown lines. Otherwise, the whole system can fail. Look at the Montreal map and think from a route planning perspective when there's an electrical problem. We need 4th avenue or an adjacent station to the existing one in Chinatown.	George Fisher
10/25/2024	Please just build the Ballard Link Extension. Accelerate your timelines and stop this endless deliberating and attempts to appease everyone. These delays increase costs and threaten the entire project. Follow through on your promises to voters and build Ballard Link.	Matthew Bailey
10/27/2024	Keep the 4th ave option as the preferred alternative. It makes for a better more connected full system. Move forward on 4th!	Gavin Yehle
10/28/2024	The original Ballard Link ST3 Candidate Project clearly depicted a station at Jackson Street. The at-grade options were ruled out, and new alternatives developed. Whether it's under 4th or 5th, the project we voted for was meant to include a Jackson Street station. The North/South alternative feels like a slap in the face to those of us who voted yes on ST3. Build what was promised, or spend millions studying the North/South option only to uncover the same—if not more—hidden costs that previously deterred you from 4th Avenue. This city needs an alternative with a station at Jackson Street, and we're willing to invest in it. If inconvenience was acceptable, I wouldn't have voted for ST3 in the first place. map image attached	Daisy Quinn
10/28/2024	WSBLE Lauren Swift Central Corridor Environmental Manager Sound Transit 401 S. Jackson St. Seattle WA 98104-2826 Dear Ms. Swift, I am writing as an individual member of the public in response to the Federal Transit Administration's Notice of Intent to Prepare an Environmental Impact Statement (EIS) dated February 12, 2019 and amended notice dated March 11, 2019 extending the comment period. I have three requests that I explain in further detail below: Eliminate or modify the Sound Transit "representative" alignment as part of the Draft EIS and defer selection of a.preferred alternative until additional preliminary engineering work is completed.	Rick Krochalis

Date received	Communication	Contacts
	Evaluate the feasibility of a consolidated multimodal transportation station as an integral part of the new CID station, regardless of whether a 4th Avenue or 5th Avenue alignment is eventually chosen. Explore and evaluate Transit Oriented Development (TOD) in all station areas as integral feature of the analysis of each alternative and individual station siting. Consider different governance models to partner with Sound Transit for possible joint development opportunities. My first comment is that I appreciate the intensive level of Sound Transit planning and community involvement that has gone into the development of alternatives to be considered in the EIS scoping process consistent with 23 CFR part 450.318. It should be noted, however, based on this referenced regulation, and I quote, with emphasis added that: "Specifically, these corridor or subarea studies may result in producing any of the following for a proposed transportation project: Purpose and need or goals and objective statement(s); General travel corridor and/or general mode(s) definition (e.g., highll@y., transit, or a highway/transit combination); 3. Preliminary screening of alternatives and elimination of unreasonable alternatives; 4. Basic description of the environmental setting; and/or 5. Preliminary identification of environmental impacts and environmental mitigation." My point is that this transportation planning work undertaken by Sound Transit to date can certainly be used for preliminary screening of alternatives and preliminary identification of environmental impacts, but scoping under NEPA and the rigorous analysis performed as part of the Draft EIS process must be used to determine and analyze the reasonable range of alternatives studied by the lead agency, Sound Transit and the Federal Transit Administration. The "representative" alignment used by Sound Transit to compare other alternatives during this pre-NEPA planning process is not required to be selected without any modification to be one of the alternatives subjected to detailed study in the Draft EIS. The Sound Transit analysis presented to the Elected Leadership Group on February 1, 2019 and the Stakeholder Advisory Group on January 30, 2019 showed several charts labeled Level 3 evaluation, Overview of Key Differentiators and Key Considerations Ballard Terminus Station. What is important is that these charts summarized many low and medium performing evaluation measures for the ST "representative" alignment as compared to two other potentially higher performing alternatives. Either the ST "representative" alignment should be eliminated at this time or a new "hybrid" representative alignment should be developed during the Draft EIS process before elected officials are asked to make a decision on what alternative should be considered the "preferred alternative." With only concept level design work completed during this pre-NEPA transportation planning and community engagement period, additional preliminary engineering completed as part of the Draft EIS process would allow a higher degree of reliability in selecting a preferred alternative. My second comment concerns using Sound Transit's stated Purpose and Need statement to develop and evaluate alternatives and select a preferred alternative. Several of the Sound Transit Purpose and Need statements directly relate and support the community's interest in	

Date received	Communication	Contacts
	further analysis of an alternative(s) which includes a multi-modal transportation and cultural hub linking King Street and Union Stations as a component of the Chinatown-International District (CID) Station. These statements quoted from the Federal Register Notice dated February 12, 2019 are: "Improve regional mobility by increasing connectivity and capacity through downtown Seattle to meet projected transit demand. Connect regional transit centers as described in adopted regional and local land use, transportation and economic development plans and Sound Transit's Regional Long Range Plan Update (Sound Transit, 2104). Expand mobility for the corridor and region's residents, which include transit-dependent, low-income, and minority populations. Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development and multimodal integration in a manner that is consistent with local land use plans and policies, including Sound Transit's Transit Oriented Development and Sustainability policies." The future CID station is the only station where all three light rail lines converge for transfers, is in dose proximity, but not connected to Sounder Commuter Rail, Seattle Streetcar, Amtrak Intercity Rail, King County Metro and ST Express buses. Currently, these pedestrian transfers between modes are confusing and riders need to cross busy streets. As far as consistency for the proposal of a multimodal transportation hub in South Downtown with local land use plans and policies, the following excerpts are relevant: From Puget Sound Regional Council's Vision 2040 Plan: "MPP-T-32: Integrate transportation systems to make it easy for people and freight to move between one mode or technology to another." "MPP-T-21: Apply urban design principles in transportation programs and projects for regional center and high capacity transit station areas." Adopted Seattle Comprehensive Plan: "TG3: Meet people's mobility needs by providing equitable access to, and encouraging use of, multiple transportation options." "TG 7.6: Work with regional agency partners to expand and optimize cross-jurisdictional regional light rail and bus transit service investments that function as a single, coordinated system to encourage more trips to, from, and within Seattle on tra·nsit." I request that Sound Transit evaluate the feasibility of a consolidated transportation station as a integral part of the new CID station, regardless of whether a 4th Avenue or 5tl1 Avenue alignment is eventually chosen. Finally, I would like to ask Sound Transit to work with the City of Seattle, as a cooperating agency under NEPA based on the Partnering Agreement between both parties signed on January 5, 2018 and December 10, 2017, respectively, to fully explore and evaluate Transit Oriented Development (TOD) in all station areas (See Partnering agreement section 2.3.4) as integral feature of the analysis of each alternative and individual station siting. Sound Transit set the standard for high quality economic analysis studies of potential TOD sites along the light rail corridor from Tukwila to Federal Way and included the results in the Draft EIS for this project. This type of work should be replicated for the West Seattle to Ballard Link Extension. The scope for work for TOD studies with the	

Date received	Communication	Contacts
	City of Seattle would need to be developed to also take advantage of possible public-private partnerships with priorities set for those stations with the highest potential for redevelopment and increased ridership. The FTA Federal Register Notice dated February 12, 2019 page 3543 previewed such opportunities for joint development stating: "The build alternatives could also include transit related roadway, bicycle, maritime, and pedestrian projects by Sound Transit or others. Those improvements may be eligible for federal funding and could be part of the transit project or constructed together with it as part of a joint effort with agency partners, thereby meriting joint environmental analysis. This could include access improvements around station areas and over waterway crossings. Sound Transit would identify these improvements and could include them as it works with partner agencies." There is a sufficient planning and development time horizon for Sound Transit and the City of Seattle to learn and adopt best practices from other metropolitan areas with similar TOD opportunities. Both Denver and San Francisco took a long term planning approach to create a compelling vision and agree upon suitable governance models to partner with their regional transit agencies. San Francisco's Transbay Transit Center development was governed by a Joint Powers Authority and Denver's Union Station used three special purpose authorities for its work. Both projects gained federal funding to support these multimodal stations. There are at least two Public Development Authorities in Seattle whose jurisdiction covers the CID station area and other stations may require the engagement of different public private partnership entities. Thank you for the opportunity to comment. Sincerely, Rick Krochalis, AICP Copy to: Federal Transit Administration City of Seattle SCIDpda Historic South Downtown PDA	
10/29/2024	The preferred alternative makes very poor station choices in and around Pioneer Square and International District. The 4th Ave option is the best for our communities and the transit system at large. Not further researching this now will delay the system further and lead to cost increases.	Ben Williams
10/29/2024	While it may be cheaper and easier today, an alignment with no proper CID hub will be far more detrimental in the long term. A good, connective transit system in the future should be more important than a little cost savings now — and the best way to reasonably achieve that is a 4th Ave shallow/shallower alignment.	Quinn Cook
10/31/2024	Please choose the 4th Ave Shallow alternative or any of the other alternatives that provide easy transfers at the current line 1 CID station at Union Station. This station would act as the primary transit hub for Seattle providing for a better connected community as a whole.	Andreas Keller

Date received	Communication	Contacts
10/31/2024	Given that existing 1 line riders will have to transfer to travel north of Westlake, the transfer experience needs to be as quick and painless as possible. The preferred option of Dearborn/CID South fails in this respect. I urge the board to proceed with the 4th Avenue Shallower option as it would provide the quickest transfer. This would also benefit Eastside riders transferring southbound. Do not repeat the mistake of not prioritizing the rider experience as was done at Mt Baker station and others!	Evan Nelson
11/01/2024	I live in Ballard and, while the repeated delays of the Link extension are frustrating, even more frustrating would be getting this project wrong--which I feel Sound Transit is about to do. The North and South of CID plan makes no sense at all. The South of CID station at 6th and Dearborn is essentially useless, and missing an opportunity to create a multimodal transit hub at Union Station is incomprehensible to me. Please for the love of everything sacred just do the CID and Midtown stations like originally planned and voted on. Thank you, Ted Hastings 98117	Ted Hastings
11/04/2024	Dear Ballardlink, I am a north Ballard resident and I support the preferred alternative of putting the terminal on 15th. This will allow for possible extension in the future to Holman Road and beyond. I have no opinion on tunneling vs above water crossing of the ship canal, however, environmental and budget considerations (versus asthetics, etc.) should be taken into consideration. Thank you, Leila El-Wakil Loyal Heights	Leila El-Wakil
11/04/2024	The 4th Avenue options for International District/Chinatown are the only options that seem feasible and sensible. The 5th Avenue/Harrison Refined option makes the most sense in tandem with that. The new preferred alternative of having a completely new "South CID" station is absolutely mad from a passenger logistics standpoint and was clearly initially thought of by someone who never rides the light rail or trains in general. Also, as an aside, the proposed "Seattle Center" station should probably be called "Uptown/Lower Queen Anne" or something to that effect, as none of the proposed locations are actually in the Seattle Center, and the monorail already refers to their station at the Seattle Center as "Seattle Center Station". Having two different transit stations called "Seattle Center" would be confusing.	Duncan Adelaide

Date received	Communication	Contacts
11/05/2024	I am worried about the preferred alternative route for the following reasons: (1) Wouldn't tunneling under the ship canal be FAR more expensive than an elevated bridge? (2) It seems to me that NONE of the route alternatives provide a station in the heart of the business & retail hub at South Lake Union, (the center of South Lake Union is near Mercer & Westlake and NOT at Aurora & Harrison) so why do all of these plans skip that area???? (3) I LIKE the preferred alternative that appears to provide an additional station for the ID/Chinatown, which could also help reduce the station bottleneck whenever a stadium event ends	Mark Eshom
11/06/2024	This is the 21st century. Please do this right and make the Ballard link extension underground. It may be more expensive at the outset, but it is the most sensible approach in the long run. This entire project is for the long run, is it not? Then please do it right from the beginning, instead of cutting corners to save a few dollars. Such approaches inevitably end up costing more in the long run. And marring the landscape in the middle of this beautiful city is too high a cost.	Jeanette Brinster
11/06/2024	If we can push through the ~$7 billion west seattle link extension, we must get the route for the Ballard Link extension finalized and ensure it creates the best system for those who live in the CID and those who are traveling or commuting through. There is widespread support, especially within CID, for a shallow 4th Avenue Link station for the Ballard extension. Such a station would benefit residents of the CID as it would give them a truly world class transit connection to every part of the region, helping with economic mobility and reducing air pollution as less cars and trucks would need to travel through the historically disadvantaged neighborhood. It also simply makes financial sense as you get the most bang for your buck by building a station connected to the existing CID station instead of building two stations north and south of the CID. Doing so would not only be a massive headache for commuters and transit riders (20 minute transfers, awkward tunnels, you name it), but it would be terrible for the residents of the CID for the same reason. Not to mention building two stations is far more expensive than building one placed in such a prime location. We need to give the residents of the CID the connectivity to the region they deserved decades ago. Building the 4th Avenue and Jackson station for the Ballard Link extension is a must for us to begin to repay the community of the CID for all the hardships forced upon them by decades of racism and redlining. Building the 4th Avenue CID station for the Ballard Link extension is a must to ensure greater equity for the residents of the neighborhood and for Seattle to have a world class rail transit system for centuries to come. In addition, I do believe the South Lake Union station, or the track between that and the Interbay station, should have a flyaway built to allow for Link down Aurora Avenue in the future. It would add construction costs to the extension, but if we are to realize the City's Long Range Rail Plan released last year, that is also a must. In fact, we could use the money that would go to the north and south CID stations (since we should and must build the 4th Ave CID station) and use that to fund the construction of the flyaways. Doing this would also massively reduce construction costs and disruptions to the 1-line if we build an Aurora extension in a future capital project package.	Wilson Bailey

Date received	Communication	Contacts
11/07/2024	I'm new to this agenda but I would definitely love to see a light rail extension in the Ballard neighborhood. About 6 years ago when I first moved to Seattle, I've always loved the Ballard area. I would take a bus from SLU (where I was living at the time) to visit the Locks, go to the Farmer's Market, play games at Mox and build furniture at Ballard Woodworks. I've since moved to the Ballard area as it's always been a place I've wanted to live. However, its distance from downtown and SoDo has made it a bit of a chore to frequent places that I still visit: Westlake/Pier 55 and the International District. (e.g. The Seattle Waterfront, Uwajimaya and the Seattle Bouldering Project) Having a way to get to these places without having to drive in traffic would encourage me to expand my shopping destinations and I'm sure it would encourage others to visit all the shops/businesses in Ballard, as well. Reducing traffic and general carbon emissions from driving would also be a huge benefit to our already congested city. The proposed route seems much more ideal as the elevated route runs near the already active railway. Neighborhoods near the exposed section would probably appreciate the consolidation from a noise and property value perspective. I'm no expert in rail construction but if we can build this in an eco-friendly, cost effective way, I think it would be of great benefit to both Ballard and the greater Seattle area.	Justin Hedani
11/07/2024	Strongly in favor of 4th ave shallow or shallower options for CID and a midtown station. Improved connectivity to Amtrak and other link stations. Disturbance for several years during construction is far better than permanent lack of high quality connectivity for the entire transit system. Please focus on the future for these kind of major one chance projects. There will be disruptions wherever the construction takes place, but this will ultimately be a boon for the economy of the ID area. Harm to the local economy and residents in the area can be minimized during construction and is temporary. Harm to the multi billion dollar transit system due to station locations that don't allow for fast connection between lines is permanent. Please focus on connectivity and future-proofing this transit system.	Trace Johnson
11/07/2024	Please label stations on displays. also details on elevator and accessibility, parking...North /South descriptions in Union displays hard to find and read about. Maybe a group walk through with explanations from knowledgeable staff. (with microphones?)Thank you.	Sue Kay
11/07/2024	What location would let us build more cultural facilities, like community centers spaces for small business and parks? - What are the current station design plans? Are we considering somethings like commercial or mix used type of station in Japan, rather than "just a station. 2. How much affordable housing could be build for elders or very low income families around the stations? 3. How long will 4th Ave will be shut down to build the station or stations ? 4. After the stations are built, how many more people in the CID will use the new light rail station?	Esther Chen

Date received	Communication	Contacts
11/07/2024	as a CID resident, my preference is for north and south station. as 2021 CAG member, it wasnt clear the traffic and impact during multiple game days. please do an impact study for when multiple game days are occurring on the same day. when multiple concerts and festivals are occurring on the same day. the impact of constructions and traffic when multiple things are happening. not just on a quiet regular day. how many of residents move out/displaced when construction occurred at other stations? what are the air quality impacts with 12 years of construction when we already have I-5? we already under a flight path how are air filtered? are there manual air filters? additional trees to clean up? what are the noise level under construction? right out side our window in little saigon, already has construction and i cannot hear during meetings with their drilling	Yin Yu
11/07/2024	I live in NE Seattle and commute to South Lake Union and Belltown frequently. I'd like to see more accessibility for people in South Lake Union proper, around Fairview/Westlake, easy connection from everyone who is IN SLU rather than on the outskirts of the neighborhood. Additionally, I have to bike, light rail, then bike again for my fastest commute - make it easier to bring my bike on the train or down to the platform.	
11/07/2024	I'm in support of expanding to Ballard. I was wondering if most people there have vehicles and it's already accessible I wish the train ran all night truly. The 1 line and 2 line should have one last train at 3AM or 4 AM. This would be in support of people who have been drinking.	Julian Lewis
11/07/2024	After reviewing all options for the BLE scoping session, I was disappointed to see that the North South option was the preferred alignment for downtown/midtown. The loss of the midtown station is massive, while the walk-shed is still relatively covered, due to Downtown Seattle's intense topography, I believe there is a disproportionate impact to the deletion of this station. For the Chinatown portion of the project, the 5th ave shallow and 4th ave shallower options seem to be the most compelling, with the reuse of part of Union Station's concourse as a passthrough for the 4th ave being the best for transfer options. With 4th street redevelopment already happening, it would make sense to go with the 4th street redevelopment option for the least disruption. The north-south option doesn't really add much in terms of new coverage. Boxed in by i90 and i5, the dearborn location promises redevelopment that would already be able yo happen with the current CID and stadium station locations. Additionally, the new pioneer square/midtown option is particularly bad because the eastern side of the walk shed for the station is cut off by i5. Neither of these stations bring anything new to the table and present significant drawbacks relative to the other alternatives. I implore the board to reconsider the preferred alternative in the CID/downtown portions of the alignment as this might be one of the most consequential decisions that they will make for the future of our system. Even if it took longer, doing it right the first time is important to the success of our transit.	Dante Morelli
11/07/2024	Seattle desreves to have a regional hub just like other cities. Everything should be close together and only the alternatives with a station at Jackson Street should be considered. Midtown deserves a station, the North/South alternative doesn't put one there. The closer Seattle Center station is to Seattle Center, the better.	Daisy Quinn

Date received	Communication	Contacts
11/07/2024	Will there be opportunities for conversation/formalized process around a community benefits agreement? Are there considerations for ETOD, community centers, parks, cultural facilities in areas of land purchased/used by ST for construction? Will there be opportunities for jobs/building related to the construction process that can be given to community members? What do affordable housing options look like/are being considered as the LINK is being built? Is there a process for "reimagining Dearborn" re: public lighting, restrooms, green space, etc? I have a preference for the North/South station alternative over the 4th or 5th stations. Thanks for the presentation and info!	Stephanie Zhang
11/07/2024	I prefer the north and south option, but I really want Sound Transit to be distinct on where the traffic mitigation and reroutes are, how long it's going to be, what the volume of cars and buses going into the neighborhood is, both Pioneer Square and the International District. I think we're really worried about pedestrian safety, how that's going to affect pedestrian safety. I think that's the biggest concern because one of my friends got hit on the southeast corner of Hing Hay Park about two months ago. He's a big guy, so he flew up in the air. He was hit by a white truck, so if anyone knows the white truck, please let us know who did it. He was a big guy, so he survived it, but if he was like an older auntie or uncle, they wouldn't have survived, so we're really concerned about pedestrian safety, and we want to see a clear plan on what Sound Transit's traffic mitigation plan is. (Given through Cantonese Interpreter Howard Chou:)	Rachtha Danh
11/07/2024	I'm concerned about the new station will have issue with the air pollution in the International District Chinatown area. I'm also concerned about the safety for the kids, also worried about the safety for the elderly, and then the air pollution issue. Mainly, it's the safety issue, air pollution and the lighting, but please take it into consideration for the younger kids and then the elderly people about the air pollution and the safety. (Given through Cantonese Interpreter Howard Chou:)	Kai Kwok Wei
11/07/2024	I've been attending meetings all along, and the main concern is if the stop is at the 4th Avenue, it's going to affect the Chinatown gate, and then also the Hing Hay Park is going to be affected. The business on 4th Avenue is going to be affected, so I prefer to have the stop built at 5th Avenue instead of 4th. The majority of the Chinese population live on 6th Avenue and the Main Street in that neighborhood and would like to have the area to be a little bit more peaceful and quiet, not having the station there to have a lot of people going back and forth, and the traffic is one concern that I have. (Given through Cantonese Interpreter Howard Chou:)	Mei Fong Zhu
11/07/2024	The main concern is the safety around the station. To the citizens of CID, especially the older people, they're afraid to go out in the night because of the safety concern. The other concern is the noise as well as the air pollution in the area. The main concern is the homeless people. There's too many of them walking around, and it's not safe for the elderly people. The elderly people, they're concerned for the next generation. (Given through Cantonese Interpreter Howard Chou:)	Ru Juan Ma

Date received	Communication	Contacts
11/07/2024	The station has a big impact with the environment, especially to the pedestrians that's walking, not taking the transportation. The intersection and the traffic lights also are a main concern. The other thing is they're building low income housing, and I'm very concerned, so moved over to 13th Street. This is the vandalism to the entry door. Within three months there were six incidents that they broke into the door of the residents, so it's very unsafe. Also, same thing, sound pollution and air pollution is also a major concern when they construct the new location. The main concern is the safety of the residents in the neighborhood. Hopefully, the government will pay more attention to the senior people. (Given through Cantonese Interpreter Howard Chou:)	Diane Weng
11/07/2024	During the construction, the biggest concern is the air pollution and the noise pollution, and the elderly people mostly live in the 520 Main Street, in that area. If the construction is in their neighborhood, they're afraid to go out because of the noise and the air pollution. The other big concern is the homeless people. If the station is built, they're afraid that there's too many homeless people. They already have multiple incidents where early in the morning they would be knocking on the door. That would make them very scared to go out. The recommendation is the station should be built a little bit further from Chinatown so that it'll keep the neighborhood safe. There's the crime rate. They had a resident in the same building who went to the triangular area where the bus stops are near 520 Main Street. One of the residents that lives in the same building got pushed and fell on the street. I heard him fall and knock his teeth out. The main concern is the crime rate, and the safety for the elderly people.	Wei Lan Wong
11/08/2024	Extend DEIS comment period to 90 days. 2. Do a social and economic impact study of station alternatives for the CID. Include impacts such as walking distances on residents and businesses, institutions, health clinics, schools, after school programs, tongs, family associations, and museums in Chinatown, Japantown, and Little Saigon. 3. Study physical, social, equity impacts to 1200+ elderly, physically challenged non-English speaking residents for each of the alternatives proposed for CID 4. Drop consideration of 5th Avenue alternatives because Sound Transit board member and Mayor Harrell has said they are “culturally infeasible to build.” Thank you. Betty	Betty Lau

Date received	Communication	Contacts
11/08/2024	The new DEIS needs to include independent consultant's reports on North of CID, South of CID, and original Midtown stations in order to compare with the 4th Avenue Risk Study. It must include soil studies and risks of displacement of numbers of low income BIPOC to be displaced and numbers of social service agencies to be affected, numbers of non English/limited English speaking seniors and those in Nikkei Manor Assisted Living. 2. The new DEIS needs to include studies of current attendance at community programs for residents and the public, such as elder care and elder services, especially those with mobility and cognitive challenges, martial arts, the Wing Luke Museum, the Japanese American Museum of Seattle, day cares, public (Summit Sierra) and private schools (Puget Sound Community School), special needs students, language and citizenship programs, youth programming, culturally and linguistically appropriate health care and herbal clinics, community social service programs, language schools and how light rail construction for all the alternatives would impact such programming and services. 3. The new DEIS needs to contain a multilingual plan for informing non English speakers throughout the region of each station's impacts on how they will travel about the region on light rail outside of their immediate neighborhoods as per the Language Assistance Plan and Title VI. Thanks, Betty	Betty Lau
11/09/2024	Please change the Interbay segment to be an underground tunnel instead of an elevated guideway, especially along Elliott Ave. This is critical for limiting the noise level for this residential area during both operations and construction. There is already a lot of noise pollution from the freight trains and roadway, which is already highly disruptive in this residential area. Please don't add to the noise! Underground tunnel, please!	
11/09/2024	The Ballard Link extension is much more important than the West Seattle Link extension. If any funds or resources from WSLE can be diverted to BLE then please do so. BLE will serve on average almost 3x as many daily riders per station as WSLE indicating much higher demand. Just the C-ID station alone is estimated to have as many daily riders as all of WSLE. Also the cost per BLE rider is a whopping 34% the cost of WSLE riders. Please email me at intcreator@gmail.com if you would like to see the math; I can give you a spreadsheet. BLE makes more social and economic sense to push forward now compared to WSLE. I also support a shallow 4th avenue station for C-ID. That area has great potential to be a transit hub with the existing Union Station, easy access to King Street Station, and several local businesses. It will be expensive and time consuming to build, but it will be worth it over the next 100-200 years when the station saves time on BILLIONS of trips (32,150 daily riders * 365 days * 200 years = 2.35 billion trips). Please choose 4th avenue shallow to be a legacy of the beautiful C-ID neighborhood and bring travelers there for decades to come.	Brandon der Blatter
11/11/2024	In the CID, I think one of the 4th Ave options would be better than the preferred Dearborn option, because the underground pedestrian connection to the existing station will make it easier to transfer. I don't think people will be willing to walk all the way from Dearborn to the existing station to transfer, especially when it's raining. The 4th Ave option would also make it easier for people to transfer to Amtrak and Sounder trains. The 4th Ave option is also more convenient to places I want to visit in the CID, like Hing Hay Park and a lot of the restaurants. People will be less likely to visit the CID if the light rail lets out so far away from the businesses they want to visit.	Nora Sandler

Date received	Communication	Contacts
11/11/2024	I'm concerned that the Sound Transit Board of Directors are sacrificing long-term network connectivity for short-term cost savings in the identification of the preferred alignment for the Second Downtown Light Rail Tunnel. On the Sound Transit website, it states that the Board prefers (and will likely choose if nothing is done) a station being located south of the Chinatown-International District (CID) and the existing CID Light Rail station, with a transfer station being located at the existing Pioneer Square Station. This routing is bad for the general public and our regional development, and I think Sound Transit should select the 5th Avenue Midtown and the 4th Avenue Shallow CID station alternatives instead. Firstly, locating the new station south of the CID, practically underneath the Interstates 90 and 5 freeway interchange, by little means improves transit access to the historically disenfranchised, discriminated, and underserved communities of the CID. Secondly, this is not what voters wanted or voted on when Sound Transit 3 (ST3) was passed in 2016. On the ST3 Ballot Measure (then Proposition No. 1), the plan originally called for new stations to be located by the existing CID Light Rail station and by the Seattle Public Library Downtown, with the one by the Library dubbed "Midtown". This routing option still exists under the "4th Avenue Shallow" and "5th Avenue/Harrison Street" alternatives on their website, so reviving them is by no means impossible. Thirdly, this is simply bad for riders. The Midtown station located under 5th Avenue that this Preferred Alternative would delete would likely be the most used station on the entire Light Rail system, being located by the Library, Seattle's Civic Center, the Columbia Center, and First Hill. Moving this new station to be by the existing Pioneer Square station would not only steal ridership away from that existing station, but create a needlessly long transfer (potentially exceeding 10 minutes!) for those coming from Bellevue but who want to continue south to SeaTac or Tacoma. Furthermore, having the CID station south of the CID itself, would — beyond its low ridership and probable undeserving of the community — also eliminate the quickest options for a transfer from Bellevue heading south. Having the station in the CID, whether under 4th or 5th Avenues, would also allow for direct and seamless transfers with Sounder commuter rail and Amtrak at King Street Station. I think that action should be taken to correct historic injustices, fulfill the promise assured to our region in 2016, and improve the future generations of Transit riders. Thus Sound Transit should choose the 5th Avenue Midtown station and the 4th Avenue Shallow CID station alternatives for construction of the Ballard Link Light Rail extension project.	Ryder Ransom
11/11/2024	Project Purpose & Need: I am glad that Sound Transit is making progress on advancing the design for the Ballard Link Extension. It is a project that is needed for Seattle and will greatly increase access for rapid transit in the area. CID/SODO Alternatives: I would ask Sound Transit to change their preferred alternative from Dearborn Street to the Shallow or Shallower options underneath 4th Ave. Moving the station to 4th Ave makes transfers between stations easier because it would be between King Street Station and the existing CID Station on the 1 Line. Even though having a station at Dearborn street can increase the area around a station that is within 10-minutes by walking, this option reduces the potential for having a central hub for rail in Seattle. Having a central hub makes transfers easier and I believe will make a stronger case for development in the area.	Ramon Rafols

Date received	Communication	Contacts
	Downtown Alternatives: Because I choose a different alternative for the CID/SODO segment, that defaults me to the 5th Avenue/Harrison Street Refined alternative for Downtown. South Interbay Alternatives: I like the preferred alternative at Galer Street/Central Interbay for this segment. This is the best option because it is the closest option to the cruise ship terminals. An important consideration for this alternative is how people will be able to get to and from their cruise ships from the station. From the maps provided and using Google Maps, the station's location is not directly accessible to the cruise ship terminals. Having access to the terminals will be a big incentive for people to use this station during the busy summer months. Interbay-Ballard Alternatives: For this segment, I like the preferred alternative of a tunnel underneath 15th Ave. I think that both station locations are good. At the Interbay station, I would consider how pedestrians will be able to access the station to and from Magnolia. I am not sure if the sidewalks along W Dravus Street will be good/safe enough.	
11/11/2024	I have already submitted a comment on the Ballard Link extension, specifically about the placement of the CID/SODO station. I still stand by my belief that constructing it at 4th and Jackson would have the most benefits for the network as a whole due to ease of connections, but would also be the most equitable to the residents of the CID as it would give them a truly world class transit center that is entirely underground, so it does not disrupt the neighborhood the way Interstate 5 does. I believe the best option specifically for the CID/SODO station is not the preferred alterantive, as the station placement leaves much to be desired. I believe the shallower 4th Avenue station is the best option as its construction would not only be the cheapest - it would also be the fastest to build, which would limit any disruptions due to construction and allow the residents of the CID to enjoy unparallelled access to the city's and the region's employment opportunities far sooner than deeper options or options that move the station away from Union Station and the existing CID station on the 1 Line. For the remaining station placements, I prefer the preferred alternative, although building elevated for the Ballard and Interbay stations would have advantages in cost savings and making further 1 Line extensions from Market and 15th cheaper to construct. However, I do have to prefer the tunnel option as a rotating bridge could disrupt operations whenever a tall boat is passing though the ship canal which happens quite frequently. This does mean that future expansion will be more expensive, though I could imagine an elevated junction station somewhere around 85th and Aurora (there is Phinney Ridge so having the portal out of that could work) to interact with an elevated alignment along Aurora Avenue before joining the 2 and 3 lines at Northgate and terminating there, leaving a flyaway for a potential expansions to Lake City and Bothell. That last part is definitely a more long distance vision, but I do believe the City of Seattle's Long Range Rail Plan from 2023 should be looked at closer when planning out future expansion programs like a Sound Transit 4 ballot measure.	Wilson Bailey

Date received	Communication	Contacts
11/11/2024	The current preferred alternative (Dearborn) would severely cripple SoundTransit's ability to create a future transit hub at Chinatown/Int'l District. Any of the other alternatives will surely create a larger benefit for the people of Seattle in the long run, and a larger cost now will mean a better transit system for all those in the future.	Heerod Sahraei
11/11/2024	I am a huge proponent of having light rail in Ballard. I think it would be a great improvement for the area. We should prioritize speed/efficiency and not let NIMBYs get in the way of progress for the community.	Destinee Evers
11/13/2024	For the love of God, if you want to see light rail in Ballard before 2060 - if you want to see light rail in Ballard at all - SHORTEN THE PLANNING PROCESS. I fear if you don't make forward progress and acquire momentum, ST3 will be overturned and BLE will be canceled. Planning is great but there is too much of a good thing. Planning causes delay, and too much delay can be fatal. You've had open houses and scoping meetings already - I've been to them. What's the value add of more? Show some progress. Show some forward movemement. Acquire momentum. Shorten the planning process, minimize delay, and start actually BUILDING (ie, physically constructing something) sooner rather than later.	Jeffrey Wolf
11/13/2024	I'd like to make a statement in support of the 4th Ave. shallower and shallow alignments. All of the evidence points to either alignment being a far better choice for the region across all of ST's design priorities, from operations to equity. 100 years from now, the region and the CID would be vastly better off under a 4th Ave. alignment.	Will Tomasini
11/13/2024	For the preferred CID/SODO station, either the station should be eliminated or a pedestrian access portal should be constructed at 5th & Lane, with an underground passageway from the preferred station and to the existing Union Station station. This would allow access across the neighborhood and allow a connection, though a little bit of a stroll, to the other line and transit connections.	Stephen Hochberg
11/13/2024	The purpose statement uses language of "expand mobility" and "improve mobility" but does not define mobility. It would be better to indicate more unambiguous and concrete goals and principles. Is a purpose to maximize light rail ridership? To maximize mode shift (cars to light rail)? Something else?	Michael Gillenwater
11/13/2024	With regard to the Interbay-Ballard sections, if there are delays with the section of the line from Interbay to Ballard, would there be operations available to the Interbay station from the southern portion of the line? Is there enough operability to open a portion of the line without the terminus at Ballard?	Stephen Hochberg
11/13/2024	I strongly urge ST and the Board to pick the 4th Avenue station location for the CID. It's an opportunity we can't miss out on.	Catherine Welch
11/13/2024	I like the project. I am hoping for a tunnel station in Ballard because I understand a bridge over the canal would require the station to sit at a very high height due to at-grade rail issues. I wish a northern Seattle Sounder station could be explored for around 85th street or above and the new light rail link might could connect some day and give better transfer options between the commuter line north and light rail.	Jonathan Garland

Date received	Communication	Contacts
11/13/2024	For the interconnection between the Interbay and Ballard stations, I concur with the tunnel option that is currently listed as preferred. An elevated track that complies with US Coast Guard regulations would be both cost-prohibitive and an eyesore on the skyline. For the Chinatown/International District, while I understand the desire to facilitate transfers between the proposed and existing station, I think the community has suffered enough construction delays and disruptions. The current preferred option or the alternate on 4th Ave would still serve the city with far less disruptions to an underserved community with historically little ability to advocate for itself.	Alexander Le
11/13/2024	ANN BRINK: I'm a resident of Ballard. I would like to be able to get information about the possible land acquisitions proposed for the Ballard North Station location. No one has this information for me today. They told me to go home and look it up, but it's pages and pages and pages, and it would be nice to have someone with a computer that could look those details up quickly. I found on my phone page 265 of 266 total, and 264, and then it crosses the Ballard bridge, 263 also. The 2022 proposal, Appendix L, only has one option which is going up 15th or slightly to the west of 15th. It doesn't show the one that would go up 14th, which is important. Those are the businesses I frequent. That part is important to me, so thank you.	Ann Brink
11/13/2024	GUINEVERE ORTRUN: I'm here today because I read that the Ballard light rail is being delayed until -- I could expect to be riding the train in 2039. I don't really need to do the math on that, but I'm going to be old by the time I ride the light rail into downtown Seattle, and some my neighbors are not going to be around anymore. I don't know if I'm going to still be living in Ballard at the time, but I was really disappointed to hear about delays. I can see that there's probably good reasons for some of those delays, but the snail's pace at which things are moving is really concerning to me. I'm trying really hard to, I don't know, not be rude or whatever, but I just really wish that people would speed up and realize that public transit is really important to the whole community. We should speed it up when we can and not allow for things to drag, for special interest groups to like take over. I don't have a lot of detail here. I just want my train.	Guinevere Ortrun
11/14/2024	Hi Scopers, My comment is for you to do an equity analysis of the racial, social, cultural, and economic impacts of the light rail station alternatives (4th, N&S of CID) on Chinatown International District. This was not done in the 2022 DEIS. Betty Lau	Betty Lau
11/14/2024	Hi, The DEIS time period needs to be 90 days, like last time, in consideration of the large numbers of non-English speakers in Chinatown International District. Thank you. Betty	Betty Lau

Date received	Communication	Contacts
11/15/2024	I am a working artist and tenant at Inscape Arts (INS) since 2020. My fourth floor studio faces Seattle Blvd on the north side of the building. I do not have a preference for the station location but if the "Preferred Alternative: Dearborn Street" option happens, my workspace will be heavily impacted and could become completely unusable. I, along with the 100+ artist tenants in the building, need serious abatement and mitigation if so. Our windows are historic single pane without screens. Construction noise will be extremely disruptive not only to me, but the clients that I serve who meet at the building. We will also need mitigation from dust and debris. Our parking lot may also be impacted because the entrance is on 6th AVE S. We need mitigation or reimbursement for this, too. The Dearborn Street station option will also likely increase the value of the INS property, further increasing the property taxes, and it is extremely likely that the owners will pass on this additional cost to us, the tenants. Artists contribute immensely to the infrastructure, livability and creative economy of Seattle. Inscape is one of the last large art complexes left in this city after years of gentrification and erosion of funding for the arts. The Dearborn Street station will further displace us and we need to be reimbursed (relocation funding) for that displacement. Effective reimbursement should be for individual tenants and as a community. The community organization at Inscape, known as Friends of Inscape, has a mission of preserving arts and culture by tying together the building's history of violent incarceration and detention with community organizing and arts in the International District/Chinatown. The station, if it displaces us, will greatly hinder that work and the organization should be reimbursed for this. A possible reimbursement option is to for Sound Transit or City to assist Friends of Inscape in purchasing the building to preserve it long-term. Thank you taking the needs of artists into consideration.	Grace Flott
11/15/2024	Dear Sound Transit, I am a working artist and tenant at Inscape Arts (INS) since 2010. My third floor studio faces Seattle Blvd on the north side of the building. If the "Preferred Alternative: Dearborn Street" option happens, my workspace will be heavily impacted and could become completely unusable. I, along with the 100+ artist tenants in the building, need serious abatement and mitigation if so. Our windows are single panes without screens. Dust, debis, and construction noise will be extremely disruptive not only to me, but the clients that I serve who meet at the building. Our parking lot will also be impacted because the entrance is on 6th AVE S. We need mitigation or reimbursement for this, too. The Dearborn Street station option will likely increase the value of the INS property, further increasing the property taxes, and it is extremely likely that the owners will pass on this additional cost to us, the tenants. Artists contribute immensely to the infrastructure, livability and creative economy of Seattle. Inscape is one of the last large art complexes left in this city after years of gentrification and erosion of funding for the arts. The Dearborn Street station will further displace us and we need to be reimbursed (relocation funding) for that displacement. Effective reimbursement should be for individual tenants and as a community. The community organization at Inscape, known as Friends of Inscape, has a mission of preserving arts and culture by tying together the building's history of violent incarceration and detention with	Susanna Bluhm

Date received	Communication	Contacts
	community organizing and arts in the International District/Chinatown. The station, if it displaces us, will greatly hinder that work and the organization should be reimbursed for this. A possible reimbursement option is for Sound Transit or the City of Seattle to assist Friends of Inscape in purchasing the building to preserve it long-term for arts and culture. Thank you for taking the needs of Inscape artists into consideration. Susanna Bluhm www.susannabluhm.com	
11/19/2024	I am a working artist tenant and teacher at Inscape Arts (INS) since 2010. I produce ceramic sculptures for gallery at Inscape. I also teach classes in ceramics at my studio. If the "Preferred Alternative: Dearborn Street" option happens, my studio will be heavily impacted and could become completely unusable. I, along with the 100+ artist tenants in the building, need serious abatement and mitigation if so. Our windows are single panes without screens. Dust, debis, and construction noise will be extremely disruptive not only to myself as an artist but for my students that I teach in my studio. Noise and dust will be a problem for us. I and my students need parking on the south end of the building. My studio is my livelihood. I can not make a living without it. Our parking lot will also be impacted because the entrance is on 6th AVE S. I may not be able to teach. We need mitigation or reimbursement for this, too. The Dearborn Street station option will likely increase the value of the INS property, further increasing the property taxes, and it is extremely likely that the owners will pass on this additional cost to us, the tenants. I have invested more than $100,000. dollars in the physical plant that I need for my artwork and for teaching. My investment at Inscape includes two gas kilns, two electric kilns, the electrical infrastructure for these kilns, a large air cleaner, a slab roller and more. I will not be able to move this heavy equipment without considerable assistance. I will lose students in the interim while I can't give classes and will not be able to produce artwork for my gallery. Artists contribute immensely to the infrastructure, livability and creative economy of Seattle. Inscape is one of the last large art complexes left in this city after years of gentrification and erosion of funding for the arts. The Dearborn Street station will further displace us and we need to be reimbursed (relocation funding) for that displacement. Effective reimbursement should be for individual tenants and as a community. The community organization at Inscape, known as Friends of Inscape, has a mission of preserving arts and culture by tying together the building's history of violent incarceration and detention with community organizing and arts in the International District/Chinatown. The station, if it displaces us, will greatly hinder that work and the organization should be reimbursed for this. A possible reimbursement option is for Sound Transit or the City of Seattle to assist Friends of Inscape in purchasing the building to preserve it long-term for arts and culture.	Kathleen Skeels
11/19/2024	I am a working artist and tenant at Inscape Arts (INS) since 2009. My fourth floor studio faces Seattle Blvd on the north side of the building. If the "Preferred Alternative: Dearborn Street" option happens, my workspace will be heavily impacted and could become completely unusable. I, along with the 100+ artist tenants in the building, need serious abatement and mitigation if so. Our windows are single panes without screens. Dust, debis, and construction noise will be extremely	PaTan Robinson

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	disruptive. Our parking lot will also be impacted because the entrance is on 6th AVE S. We need mitigation or reimbursement for this, too. The Dearborn Street station option will likely increase the value of the INS property, further increasing the property taxes, and it is extremely likely that the owners will pass on this additional cost to us, the tenants. Artists contribute immensely to the infrastructure, livability and creative economy of Seattle. Inscape is one of the last large art complexes left in this city after years of gentrification and erosion of funding for the arts. The Dearborn Street station will further displace us and we need to be reimbursed (relocation funding) for that displacement. Effective reimbursement should be for individual tenants and as a community. The community organization at Inscape, known as Friends of Inscape, has a mission of preserving arts and culture by tying together the building's history of violent incarceration and detention with community organizing and arts in the International District/Chinatown. The station, if it displaces us, will greatly hinder that work and the organization should be reimbursed for this. A possible reimbursement option is for Sound Transit or the City of Seattle to assist Friends of Inscape in purchasing the building to preserve it long-term for arts and culture. Thank you for taking the needs of Inscape artists into consideration. PaTan PaTan'sArt.com	
11/20/2024	I am one of hundreds of elderly residents of the 4th and Republican area that may be displaced. I would recommend alternative station location to avoid this. It will be impossible to find comparable housing for all of us.	Kristin Carver
11/20/2024	The more we look at options, the worse things look for the downtown tunnel/CID station. There are no positive outcomes from drilling a second tunnel. We should dedicate our resources to automating the system, grade separating the Rainier Valley, and solely relying on the downtown transit tunnel. The volume of trains would be high but not outside of global norms. The frequency of trains would keep crowds manageable and the benefits of concentrating resources would be profound. This would save several billion $, all of which are needed to afford the tunnel in West Seattle (poor planning) and delivering Ballard on time (poor stakeholder management).	Benjamin Keller
11/21/2024	Very concerned about how this will impact some core creative institutions in downtown (SIFF). Please make sure we're considering our foundational Arts areas when deploying the Link Extension. I know this is difficult work, but keeping what remains of our artistic community in Seattle is of utmost priority to thousands in this city.	Ben Andrews

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11/21/2024	Good Evening, Complete the Shallower 4th Avenue CID station. This is the only option that would make king street station a central hub and make changes trains easy. It is worth the time and money for the long term investment. Very Respectfully, Will Condon King County Resident	Will Condon
11/24/2024	Craig Ima - Family member of the Mary Ima LLC who owns 410 4th Avenue – Ballard Link Extension project - The Preferred Alternative Route affects us. We are against this route, or the other routes that affect us, as it will take the building away from us and impact the Washington State Department of Correction's 43-year stay with us helping convicts acclimate to becoming contributing members of society. As my cousin, Matt Ima, mentioned, we were not told about this project and a family contact of ours informed us that we could be affected. We've owned it since 1940 (84 years) SUPPORTING THE COMMUNITY Family was incarcerated during WWII because of being from Japanese decent. My uncle, Kenji Ima (who was incarcerated in the internment camp) is here to make a statement along with my cousin Matt Ima and sister Stefanie Lindgren. Kept it and ran as a hotel until late 70s. Supporting low income community. We feel a part of the International District. Mary Ima (Grandmother who originally bought it in 1940) best use for the community with the DOC, Washington State Dept. of Corrections. Give back to the community and maintain retirement. Have been approached through the years. No interest. Believed the right thing to do was SUPPORTING THE COMMUNITY (a win win) DOC is and has been a great partner. 43 Years!!!! More than 10,000 served. Helping marginalized citizens close the gap of the racial inequalities of this nation. Help them become productive members of society. 100 beds with a waiting period. Carrie Stanley - Reentry Center Administrator is here to tell you more. History, landscape, service. Tell you this because of the hardship of the internment camps, unjust, hard work, to make lives better for the next set of generations, American dream, to move forward and do the best they could, and now it seems like similar times all over again. I've got two daughters who I would like to help make their lives even better with continuing this legacy. This would be the 4th generation. SUPPORTING THE COMMUNITY Current preferred alternative route is too expensive, disruptive, and cumbersome for the use. Eminent domain on a public use facility is not allowed. Again, eminent domain on a public use facility is not allowed. The DOC does not own the property, 43 years seems like it has some standing. And we would like to continue this partnership. Also, there is nowhere for a relocation of the program. THE DOC HAS DONE an EXTENSIVE AND THOROUGH SEARCH! Communities do not want this in their neighborhood so where it is on 410 4th avenue is ideal. Carrie Stanley will testify to this. We are loyal community-serving Americans, supporting what enhances the community and the greater good of our society.	Craig Ima

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	Thank you Board for considering my input on SUPPORTING THE COMMUNITY.	
11/25/2024	To whom it may concern: I'm commenting on behalf of the building located at 410 4th Avenue which could be impacted by the Ballard Link Extension Project. I am against this project happening in this area. The building has served the local community for more tha 8 decades. It continues to serve the Washington State Department of Corrections Program. That facility has no alternatives as they have a comprehensive search over the past several years and have found no options for DOC to operate. Emminent domain should not be enacted on a public use facility -- especially one that helps promote the marginalized people. Thank you so much for your consideration.	Anne Ima
11/26/2024	Hello, I am in favor of the North and South Preferred Alternative as I believe that it is the only option that will allow the International District to grow in a manner that is organic- that is which will fulfill the current residents' wishes for more greenspace, more affordable housing, and more culturally and age-appropriate services. I do want the traffic reroutes studies on all the options and their impacts on the walkability of the ID neighborhood. I want to know where the exhaust vents will be located and how that will impact the air and noise quality for all options. I want to know which business will be impacted by the construction and what the mitigation plan is for those that will be impacted for all options. I want to know which buses will displaced and where, if any, new buses will replace any of those that will be displaced for all options. Thank you, Rachtha	Rachtha Danh
11/28/2024	Conduct an Equity analysis of the social and economic impacts of light rail options on the CID and Pioneer Square. Such analyses were not included in the 2022 DEIS. Needed Information for comparison of alternatives: social and economic impacts to businesses, residents, museums, schools, tourist attractions, health clinics and effects on linguistically and culturally appropriate service providers, clients, customers, and patients. Brien Chow	Brien Chow

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11/28/2024	Good points... I'd want to double check to see if that's one of the typical review instruments under an EIS process. I would think so, but I'd want to check. Even if it's determined the agency isn't legally obligated under NEPA, it doesn't mean they shouldn't perform such a review... especially if they want to live up to the "equity" they claim to embrace in their mission statement. <> Happy Thanksgiving everyone. "Be kind, for everyone you meet is fighting a battle you know nothing about." ~Wendy Mass Paul R. Sweum, Designer & Fabricator AZWAglassworks	Brien Chow,Paul Sweum
11/28/2024	Any light rail option on 5th Avenue poses such severe risks to the cultural and economic vitality of the endangered CID that it should be removed from consideration and noted as “culturally infeasible to build” because it disproportionately impacts low-income, non-English speaking communities of color--a sentiment shared by all community members living in and outside of the CID.	Brien Chow
11/29/2024	This would have tremendous negative impact to a community and district that is already marginalized. 7 years of construction (minimum) would also put the Inscape Building and it's artists in a difficult situation for a positive work environment.	Alvin Jansuy
11/29/2024	I share a studio at the Inscape building and am concerned about the following: Loss of rare arts workspace, jobs, and economic development - More loss of regional cultural production. The creation of Inscape created new arts jobs and workspaces. With the likely noise, dust, and vibration from construction, these spaces might be no longer conducive to working, and we risk a community loss of 110 artist studios. Since ST2 construction began behind the building, artists have experienced increase in noise and dust, coming through the single-paned, non-sealing, flap windows. We ask Sound Transit to look into mitigation and building improvements, and if that is not possible to support artist tenants in relocation. Increased property valuation from transit. The building is an investment for its owners and they have expressed their rights to change the use to redevelopment into a "higher use." We are seeing how similar development in Los Angeles is affecting the affordability in Koreatown and Little Tokyo. We ask Sound Transit to look at ways to support the arts community and mitigate this potential. Historic and Archaeological Resources — This former US immigration and detention center contains unprotected artifacts of Seattle immigration history, including the tar graffiti written by detainees on in the exercise yards. We ask Sound Transit to look at preserving these artifacts that likely fragile to dust and vibration. Community-oriented Transit Development is proposed to the south of the building, which could potentially harm the historic Chinatown-International District community, which features affordable housing for seniors and	Osnat Lustig

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	families. We ask Sound Transit to raise their level of public engagement/decision making in this endeavor so that the neighborhood community determines the results of this development.	
11/29/2024	How much parking in the area will be displaced during construction and will parking be a priority for the finished sites? I support the north/South station for the future...less disruptive to the community during construction and provides opportunities to expand CID future developments to benefit business owners and residents. Thank you.	Betty Lock
11/30/2024	Dear Sound Transit, Any light rail option on 5th Avenue poses risks to the cultural and economic vitality of the endangered Chinatown/ID that it should be removed from consideration and noted as “culturally infeasible to build” because it disproportionately impacts low-income, non-English speaking communities of color--a sentiment shared by all community members living in and outside of the CID. Extend the DEIS comment period to 90 days, as was done for the 2022 DEIS so there is more time to engage with those that are disproportionately impacted. Conduct an Equity analysis of the social and economic impacts of light rail options on the Chinatown/ID and Pioneer Square. Such analyses were not included in the 2022 DEIS. Need information for comparison of alternatives: social and economic impacts to businesses, residents, museums, schools, tourist attractions, health clinics and effects on linguistically and culturally appropriate service providers, clients, customers, and patients. Chinatown is my cultural home, please be consider of our history and elders. Rebecca Chan, CPA She/Her/Hers 206.409.7657 (M) No Text Service We live on the traditional land of the first people of Seattle, the Duwamish People past and present. We honor with gratitude the land itself and the Duwamish, Muckleshoot, Suquamish, and Tulalip Tribes. Write it on your heart that every day is the best day of the year. - Ralph Waldo Emerson	Rebecca Chan
12/01/2024	HI! Excited for this new link. If you site in the CID at the preferred location, please take into account all the many artists who have work space at the adjacent Inscape building, and do everything you can to mitigate construction vibration, noise, dust and other impacts on these artists and this historical landmark building. The artists are rightly concerned that their working conditions will deteriorate greatly as construction begins, and as I'm sure you know, artist working space in Seattle is very difficult to come by and precious. Invest in making the Inscape building noise and dust proof, or find a location to relocate the artists. Please listen to their concerns and act accordingly. Thank you.	Matt Offenbacher
12/01/2024	Transportation is one of the greatest impacts on the environment and climate in the City of Seattle and the region. An effective transportation system which continues to allow for people in the region to move to jobs,	Matthew Bissen

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	goods, services, and their life flow without a car is critical. High capacity transportation that supports dense walkable and interconnected neighborhoods will also work to reduce sprawl and support growth management goals/requirements. Also, as a downtown resident and Pioneer Sq business owner it is critical to support our economy and livable neighborhoods with sound decisions for both the environment and the economy. Sound Transit planners and the Board should prioritize alternates which support the most reliable mobility, intersystem transfers, intermodal transfers and support previous investments. To accomplish this the shallow 4th and the shallow 5th avenue alternates are clear in how they provide for the highest integration with the existing CID station as well as Sounder, trolley, Amtrak and future high speed rail and the 4th Ave bus corridor. While the construction period will have impacts, the long term benefits and connectivity of Pioneer Sq and the CID to a true regional/national transportation hub is critical to the success of these south downtown neighborhoods. The second alignment alternative to strongly support is the Midtown Stop and/or configurations which best align with or have stops as close to Madison St. as possible. The city and county had just invested millions of dollars and years of construction to open the G Rapid Ride line. Sound transit needs to consider the environmental benefits of providing the best connectivity to this growing system line. It should be also noted that Sound Transit continues to make decisions to not provide effective transit support to 1st Hill, one of the most dense residential and service centers in the region. If Sound Transit continues to not serve this neighborhood they need to connect effectively and directly to the systems which are. Finally, Sound Transit and the Board should consider the environmental/economic risks of linking station development with private development. Adjacent TOD development is a must and wonderful. However, linking the station concept and ridership success to a station based on developer investment, work, and quality in lieu of supporting existing ridership/walksheds and businesses is not sound planning or environmental policy. The vacant lot across from City Hall continues to remain a drag on downtown environmental, economic, and social health all in the name of transferring public/development rights to private developers. Thank you for considering these points and my support for a Midtown alternate that aligns with Madison St/BRT line and a CID alternate that aligns with a shallow 5th or shallow 4th alternate.	
12/01/2024	Sound Transit We in the Community have worked hard to revitalize Chinatown/CID in the past decade. Building the Chinatown Gate, improving and expanding our lighted Hing Hay Park, CIDBIA's implemented sanitation/safety programs and marketing vacant store fronts with viable businesses. With all this years effort, we now have a pretty decent cultural neighborhood. Sound Transit should be improving neighbors, and not destroy neighborhoods. Any light rail option on 5th Avenue poses severe risks to our unique cultural and economic vitality and could destroy our neighborhood. I have been working in the Community for over 70 years. Currently Board	Tuck Eng

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	of Trustee in the Chong Wa Benevolent Association. Eng Association, CIDBIA and the Historic Gate Foundation. Please find an alternative and terminate the option on 5th Avenue. Respectfully yours, Tuck Eng HCGF pres.	
12/02/2024	Strongly advocate for an automated line with an alignment that has no at-grade crossings. Like the Vancouver SkyTrain. This allows shorter, more frequent trains (better for riders), smaller stations, which saves cost and increases flexibility for planning, and helps given the driver shortage	Jacob Anderson
12/02/2024	I dare Sound Tranist to be bold and consider an automated transit solution. I also urge Sound Transit to consider Seattle Subway's views on the matter, and make sure this part of Link is ST4 ready.	Joe Kunzler
12/02/2024	I am part of the Seattle art community, and I learned that The Dearborn Street Preferred Alternative Station is affecting the ability for artists to work at InScape Arts, and will compromise community, historical, and living resources during its construction and into the future. I join many other Seattlites in asking that Sound Transit take comprehensive steps to mitigate these effects, including the unhealthy dust and noise tenants are exposed to, the risk of increased rental costs proven to result from Light Rail station installments, the potential compromise of unprotected historical artifacts such as the tar signatures of detainees on the building exterior, and the costs to residents of Chinatown/International District who rely on affordable housing. Please actively support our residential and artist communities who are the stewards of this neighborhood. The lifeblood of Seattle must not be regarded as a necessary casualty of connecting the city. Thank you for your time.	Ann Grace
12/02/2024	Ballard Link alternatives should include considering different technologies, especially automated options that could allow for higher frequency and smaller---and therefore more flexibly positioned---stations as suggested by https://seattletransitblog.com/2024/12/02/ballard-link-mode-selection/	Daniel Perelman
12/03/2024	This alignment doesn't make much practical sense. Please consider an east/west line to Ballard from UW. It would get much higher ridership and solve the problem of locating a Ballard station because you could have more than one! This would replace or supplement the 44 bus line with stops in Wallingford, Fremont, West Woodland, 15th, and historic Ballard.	Conrad Guadagni
12/04/2024	As a former artist in residence at Inscape, an invaluable and unparalleled cultural resource in Seattle, I hope that Sound Transit take into consideration all of the points that the artists and community of the building have recommended including: Loss of rare arts workspace, jobs, and economic development - More loss of regional cultural production. The creation of Inscape created new arts jobs and workspaces. With the likely noise, dust, and vibration from construction, these spaces might be no longer conducive to working, and we risk a community loss of 110 artist studios. Since ST2 construction began behind the building, artists have experienced increase in noise and dust, coming through the single-paned, non-sealing, flap windows. We ask Sound Transit to look into	Margaret Argiro

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	mitigation and building improvements, and if that is not possible to support artist tenants in relocation. Increased property valuation from transit. The building is an investment for its owners and they have expressed their rights to change the use to redevelopment into a "higher use." We are seeing how similar development in Los Angeles is affecting the affordability in Koreatown and Little Tokyo. We ask Sound Transit to look at ways to support the arts community and mitigate this potential. Historic and Archaeological Resources — This former US immigration and detention center contains unprotected artifacts of Seattle immigration history, including the tar graffiti written by detainees on in the exercise yards. We ask Sound Transit to look at preserving these artifacts that likely fragile to dust and vibration. Community-oriented Transit Development is proposed to the south of the building, which could potentially harm the historic Chinatown-International District community, which features affordable housing for seniors and families. We ask Sound Transit to raise their level of public engagement/decision making in this endeavor so that the neighborhood community determines the results of this development.	
12/04/2024	My small art business Vaughn Bell Studio LLC is located in the Inscape Building. As a resident of this building and a small business owner in the cultural sector I would like to comment on the preferred Dearborn Alternative. With the likely noise, dust, and vibration from construction, my work space which has multiple single pane windows directly adjacent to the proposed construction might be no longer conducive to working. We risk a community loss of 110 artist studios. Since ST2 construction began behind the building, artists have experienced increase in noise and dust, coming through the single-paned, non-sealing, flap windows. We ask Sound Transit to look into mitigation and building improvements, and if needed, to support artist tenants in relocation.	Vaughn Bell
12/04/2024	I am a daily user of public transit on 5th Avenue, and an avid supporter of the Ballard Link Extension. I do not support the high cost of claiming eminent domain in the heart of historic Chinatown International District. Please extend the DEIS comment period to 90 days, as it will require time for people—especially local stakeholders—to understand the proposal. Specifically, we need to know if taking the land under eminent domain is contested by the property owners, and the consequences of such an action. The Chinese and Japanese communities in the area have suffered many injustices, from exclusionary acts, internment, Marshall Law declared, repeated displacement, and ongoing discrimination. The city needs to proceed with great sensitivity before it does further generational damage. Please do the right thing and give people the time to understand the proposal. Sincerely, Grace Norman area resident	Grace Norman
12/04/2024	I am concerned about the construction proposed that will negatively impact the historic Immigration Building. This building is an important part of Seattle and National history. It also is in the process of being converted to studio space for artists of many different types. The artists have already put a lot of their own time and money into it. I hope the City will take these threats to the building and surrounding communities into account and find an alternate plan for the route from Ballard to West Seattle. Thank you in advance for your consideration	Lu McBride

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12/05/2024	Design any development to ensure there is no loss of rare arts workspace, jobs, and economic development, leading to further loss of regional cultural production. In particular, protect the Inscape building. Go beyond "no loss," and ensure any development provides a net increase of arts workspaces, jobs, and economic development opportunities. Provide full mitigation compensation including materials damage/losses and temporary or permanent relocation costs if current occupants are impacted by construction. Include impacted artists' artworks in any new construction as public art acquisitions or activations. These are hard costs of the proposal, must be budgeted and planned for accordingly, and cannot be externalized as collateral damage inevitable in "development." 2) Provide financial compensation to those whose ability to afford rent at Inscape and other cultural spaces would be undermined by an increased property valuation from transit, until Sound Transit is able to prove with financial and qualitative data that its development has led to net economic opportunity and income increases for the cultural workers, organizations, and businesses directly impacted by BLE. 3) Protect artifacts of Seattle immigration history, including but not limited historic graffiti by detainees. 4) Invest in a robust, accessible public engagement and decision-making process at the "collaborate" and "empower" levels in the International Association for Public Participation's "Spectrum of Public Participation. (https://sustainingcommunity.wordpress.com/2017/02/14/spectrum-of-public-participation/).	Susano Surface
12/05/2024	As a long-time Asian-American resident of Seattle and frequent visitor and patron of businesses in the International District, I urge you to take care in all your project work in the International District: There have already been many past harms inflicted on the community here from past infrastructure projects. And some of that is very recent -- since ST2 began, the building that is home to the largest collection of artists studios and businesses, and other types of organizations, including nonprofits, have experienced dust and vibrations and noise that interferes with work and event planning at this vibrant, historic community for artists and for the public. Please do something NOW to address the disruptions people are already experiencing, so that this community of hundreds of people can continue to thrive and contribute to the local economy. Please do something now that protects the historic artifacts at this historic building. Please increase engagement with the community around this area. And please do something to prevent and mitigate against more disruptions like this in the future. Don't make things worse for small businesses and artists and historic artifacts. Make things better. Thank you.	Annabel Wrightsman
12/05/2024	I have two strong preferences: Provide a station at the intersection of 7th Avenue & Hwy 99 - this will make for easy interchanges with the RapidRide E line, to provide continuing rapid service to the Aurora Ave. corridor in N Seattle. 2. Move the Ballard station to be closer to the center of activity in Ballard (near Ballard Ave & 20th Ave)	Mark Lavrentyev

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12/05/2024	My name is Stefanie Lindgren and I am one of the owners of 410 – 4th Avenue, Seattle, WA 98104. I oppose any Ballard Link Extension routes that would cause our building to be demolished.	Stefanie Lindgren
12/05/2024	Public comment for the scoping period for BLE/EIS December 2024: My name is Sage Miller. I am an anti-displacement ally to those living and/or working in the CID and with those with a long family history rooted in the CID. I am well aware of the past injustices and racial discrimination fostered on those living in the CID, going back from the mid1800's into present times. The ST Board has been made well aware of the history of the CID through past public testimony. My understanding is Sound Transit is still looking at preferred alternatives for the ST3 location. I am in support of the position taken by "GREAT for all in the CID" which has long advocated for Mid-town/Dearborn St stations (N-S stations) as opposed to the 4th or 5th Ave alternatives. Preserving the cultural integrity of the CID, consideration of the potential environmental impact, disruption of small businesses, preservation of its fragile tree canopy, all point to the N/S alternatives. The 4th Ave Station , according to outside experts and ST studies, is NOT a viable alternative. I was surprised to see the 5th Ave. diagonal re-packaged and presented again as an alternative option. My understanding is it has long been opposed by most all community members. When I see phrases like "minimize mitigating factors" in the 5th Ave schematic, I question the reality of what that will actually mean. Within the proposed plan, businesses within the construction area will be torn down under "eminent domain" Outside the "construction area", parking, environmental hazards, and all that comes with construction of a large project such as this will affect the CID for years. To re-emphasize, the Dearborn Ave./Mid-Town (N-S) stations should be the preferred alternative. Thank you for the opportunity to make my voice heard.	Sage Miller
12/06/2024	Light rail has been an overwhelming success for the region. We need to stop doing excessive reviews - Whatever we can do to get shovels in the ground and start building this project is the best. I can't wait to ride this line from Ballard.	Brad Nelson
12/06/2024	The new CID station should have quick and easy transfers from the existing line 1 CID station. A new 4th or 5th Ave shallow station would create a world class transit hub in the heart of Seattle.	Andreas Keller
12/06/2024	Along Elliott Ave, especially between the Seattle Center and Smith Cove Stations, please have an underground tunnel and NOT an above-ground track/guideway. It is a highly residential area of Interbay, and we would like to minimize noise pollution from trains running all day and night. It is already bad enough with the freight trains and Pier 86 grain terminal. Don't add to this, please. Underground tunnel, please!	

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12/06/2024	I support light rail, the Ballard Link extension and all other extensions in the planned expansion and LOVE light rail. Thank you for conducting this outreach. As many others, I do find it more than a bit worrying that cost estimates for actually building light rail as compared with those estimates has so greatly eclipsed even the worst-case scenarios when proposed (and even when revised, then revised again, and presumably will eclipse even the latest estimates). As someone who also works for a governmental organization, I feel it substantially erodes public trust for other projects originating from government or government-adjacent entities in working with the public. I know so much hard work has gone into this and there have been many unanticipated hurdles to clear, but as a fellow public servant, I would urge future link extensions and other projects to provide realistic projections to the public in the hard and long load of hopefully regaining some public trust.	J L
12/06/2024	the shown preferred alternative for CID/SODO seems like a long walk for a transfer connection from the sounder trains at King Street station to Dearborn Street location along with several at grade street crossings how many minutes will this journey take? How long if you are mobility impaired? the at grade crossing of 4th Ave has always been the biggest obstacle of getting from train to current light rail station or bus connections. I always dream of a pedestrian underpass under the rail lines and surface streets.	Mark Sawyer
12/06/2024	Dear Sound Transit, I ask you to take a deeper look at the impact of the Dearborn Alternative and also see if there is an additional alternative to all of the alternatives (4th, 5th, and Dearborn). As a tenant of the Inscape Building at 815 Seattle Blvd. South, and also a engaged member of the C-ID community, I have advocated against the 5th and 4th Ave. stations. Now seeing these schematics of a large construction site encompassing the city's largest art studio building for seven years, it is clear that this plan with the building in its current state will make these 110 artist working spaces null to their purpose. I ask that Sound Transit deeply study the impacts of its preferred alternative on loss of cultural space, loss of economics, loss of jobs, and a further harm to the region's diminishing ability to support working artists in the face of the loss of affordable housing and workspace. Currently, the ST2 project is unmitigated for the artist tenants, while all of the spaces feature 1930s, single-paned, non-sealing, metal framed flap windows. Over the last several years since construction began, the jackhammering can hit a certain high frequency and volume that makes it unbearable to be in the space, and I have to leave for the day. Also there is a noticeable increase and high level of dust, that is unlike the typical dust in a house. Some of the dust appears larger, and it is dark. Every week I "Swiffer" dust the floor, and use a hand swiffer on the surfaces, and wipe away a dark gray layer of dust. I have an air cleaner in my space to try to make my space healthier, but I am not certain what I really am working in, and I am certain it will be a much worse issue with Dearborn construction without some changes to this building. I ask that ST look into how the workspaces can continue to be suitable and safe spaces for the artists. If that is not possible, Sound Transit will also need to study how to support and relocate 110 artists and arts non-profits currently in the building, and support them in finding this kind of space. It	Tara Tamaribuchi

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	is difficult to find affordable mixed-use, Class C spaces, at the sizes offered in this building, which range from 100sf to 1000. Sound Transit also could study ways to support the arts community that has been at risk at losing the building to redevelopment, since the ownership put the building on the market in 2021. We do know that the owners see the building as an investment and have expressed their right to use it as such. As Friends of Inscape has now formed a nonprofit led by tenant, arts, and immigrant leaders, we ask Sound Transit to study ways work with this group on saving this artist space. Currently, the Landmarking office at Department of Neighborhoods is finishing the controls and incentives for landmark designation with the ownership, and the building should be landmarked in early 2025. The building features a very special artifact of immigration on the south exterior exercise yards -- walls of tar graffiti left by detainees, which is currently unprotected and appears to be falling off the walls year by year, and possibly from the current construction. I ask Sound Transit to study the technical preservation of these artifacts that would likely be harmed by this major construction project. Lastly, with the community-oriented transit development proposed to the south of the building, I ask that Sound Transit studies and collaborates with the C-ID neighborhood in determining who and what goes into these spaces. This is a very special and rare neighborhood, one of the few historic Chinatown's left in North America that is residential and for the community, and it has not lost its vitality as a community center and become touristy facade of itself. As new development by the neighborhood can potentially harming the neighborhood which features affordable housing for low-income seniors and families, I ask Sound Transit to raise their level of public engagement/decision making in this endeavor so that the neighborhood community determines the results of this development. Instead of a threat to the neighborhood, this development should be an extension that supports the community. Thank you, Tara Tamaribuchi artist and tenant at Inscape President, Friends of Inscape	
12/06/2024	I am an artist and tenant at Inscape Arts (INS) since 2017. If the "Preferred Alternative: Dearborn Street" option happens, my workspace will be heavily impacted and could become completely unusable. I, along with the 100+ artist tenants in the building, need serious abatement and mitigation if so. Our windows are single panes without screens. Dust, debis, and construction noise will be extremely disruptive not only to me, but the clients that I serve who meet at the building. Our parking lot will also be impacted because the entrance is on 6th AVE S. We need mitigation or reimbursement for this, too. I have concerns that this former US immigration and detention center contains unprotected artifacts of Seattle immigration history, including the tar graffiti written by detainees on in the exercise yards. I would ask Sound Transit to look at preserving these fragile artifacts from dust and vibration. The Dearborn Street station option will likely increase the value of the INS property, further increasing the property taxes, and it is extremely likely that the owners will pass on this additional cost to us, the tenants. Artists	Andrea Gahl

Date received	Communication	Contacts
	contribute immensely to the infrastructure, livability and creative economy of Seattle. Inscape is one of the last large art complexes left in this city after years of gentrification and erosion of funding for the arts. The Dearborn Street station will further displace us and we need to be reimbursed (relocation funding) for that displacement. Effective reimbursement should be for individual tenants and as a community. The community organization at Inscape, known as Friends of Inscape, has a mission of preserving arts and culture by tying together the building's history of violent incarceration and detention with community organizing and arts in the International District/Chinatown. The station, if it displaces us, will greatly hinder that work and the organization should be reimbursed for this. A possible reimbursement option is for Sound Transit or the City of Seattle to assist Friends of Inscape in purchasing the building to preserve it long-term for arts and culture. Thank you for taking the needs of Inscape artists into consideration.	
12/06/2024	Stop wasting tax payer dollars on environmental studies. This need to be built, one way or another there will be an environmental impact. The fiscal impact of your delays due to environment studies has essentially resulting in this expansion to be fiscally infeasible. Gross incompetence in city planning and your department in delays due to these sorts of studies could result in the cancellation of this project. Your are billions over budget. And likely will be tens of billions over budget by the time this gets built (if ever). The land and route should have been pre-determined long ago and purchased or leased accordingly. The impact to future costs of property along the route is already stretching the costs to an insurmountable amount. ST3 has been one of the greatest failures to the tax payers in the history of this city. It has now been nearly 10 years and there is very little to show for it, while costs have ballooned. Environmental studies will do nothing to help this get done and the more these useless studies continue the more the tax payers will be on the hook for. Just fucking build what needs to be built and what we have been funding via property and sales taxes for 10 years.	Dude Dudeson
12/06/2024	Dear Sound Transit, The northern end of Elliott Ave. W. is a vibrant hub of thriving locally owned businesses and is an asset to the surrounding neighborhoods of Magnolia, Queen Anne, Ballard, and Belltown. I strongly support extending the proposed transit tunnel all the way down Elliott Ave. W. to emerge somewhere north of the Magnolia Bridge. An above-ground option would be ruinous for this busy and unique commercial neighborhood. Above-ground (and particularly elevated) track would be an eyesore and effectively prohibit non-transit use of valuable commercial property so close to downtown. Sincerely, Rebecca Castilleja	Rebecca Castilleja
12/06/2024	Build the Ballard line with the preferred alternatives in all locations except the CID/SODO section, which should really focus on either the 4th Ave shallow and 4th Ave shallower options that better connect to existing Link Stations and pedestrian thoroughfares	Chelsea Pagan

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12/06/2024	My wife and I live in the Fujisada Condominium immediately north of the proposed 5th Ave Diagonal option site. I would welcome that option as it provides convenience for the Chinatown residents, workers and visitors. The increase in business to the existing restaurants and stores will be very welcome and profitable. Those who predict an END to Chinatown need simply walk or drive over to the Alaskan Way Waterfront to see how Major Construction had minimal impact on the foot traffic on the boardwalk. Businesses remained open and will thrive due to the improvement to the area. I believe the 5-6 year estimated Construction period will be well worth the wait. The businesses displaced can be compensated for loss of revenue and costs of relocating. I understand the current owner of the large parking lot fronting the old Uwajimaya store location wants to retain development rights to the property. Why not buy the land and give that owner "Air Rights" to develop the land after the station is completed. This might remove a large roadblock and give the Owner and ST3 a Win Win solution. Any and all objections to the 5th Ave Diagonal proposal can be mitigated and fears addressed. As far as I know, the leaders of the opposition do not live nor work in Chinatown. I do!!! Please consider my opinion as one from a Neighborhood Insider. Jay Yanamura 253-332-3603	Jay Yanamura
12/06/2024	Service and possibly surcharge for cruise traffic at Smith Cove, and attention to long term connectivity to Sounder and Amtrak connectivity in ID.	Ethan Li
12/07/2024	Starting from Ballard and heading south: The End (or beginning as I see it as someone in Ballard) I would prefer the tunnel along 14th Ave, The reasons being, 14th is less traveled by though traffic. If along 15th the on and off load of passengers to and from the link would more than likely cause traffic build ups, as well as large disruptions while under construction. The benefits of 14th would be a larger area for on and off loading of passengers to and from the train, ease of construction, it would also allow the utilization of the 14th ave corridor for bus or trolley lines that would be able to feed Ballard continuing the vision of a transportation network. Also, when you factor in the replacement of the Ballard bridge (study done in 18') and the nightmare that will cause on 15th I think it best to shift and create a new Urbanistic idea along 14th rather than try and force the 3rd largest arterial road in Seattle to fit that mold. Once across the bay the stop on Dravus seems to be in a good spot, I would say it might be best to start the tunnel portal as close to the station as possible keeping the Industrial area intact. Salmon bay is near and dear to the locals and since you're making a tunnel anyways minimal impact north of Dravus would be ideal. I'll add you may want to consider the route of the tunnel in tandem with the idea of tunneling the Ballard bridge, I know that is out of scope for this project but you should look at the possibility of that tunnel and how to keep options open for the future possibility of having that exist. South of Dravus to smith cove is a real wild card in my mind. The preferred fly over of Galer and Magnolia bridge seems a bit excessive for the minimum gain it has, however I can see the appeal of being closer to Expedia, magnolia bridge, and the Elliot Bay trail. The W Prospect alternative with a station in "Central Interbay" might be the better option though. The helix bridge across the street from the station would allow for those in that waterfront area to access the train without minimal impact, there is already a large parking area you can utilize for passenger on and off load as well as the retained cut along the east side of the magnolia	Matthew Thormodson

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	bridge will allow for easier replacement of that bridge per the 18 study. It wouldn't leave a section of your train high in the sky over nothing and could allow an easier replacement of the magnolia Bridge in its current location or along Armory way once that project is taken on. Once in the tunnel south My opinions will start to lack as my knowledge of the areas aren't as strong. I think the Seattle center station should be as close to CPA as possible. The further west options seem to be less adequate for the train purpose. I don't have an opinion on the SLU station however Denny will more than likely dictate that. Saka proposed to halt the trolley, however, it was turned down by the other council members. I would say it's better to adjust the trolley tracks in favor of building the station north south on Denny, however I'll let the locals of that area dictate that. The Only thought I have south through downtown would be make sure the west lake connection is easy to transfer to between trains. That will be the largest crossover for those of us using the train from the north side. As for CID It seems like there are issues all around. I would suggest considering the impact it has on the businesses and homes that will be taken over, however that seems to be the largest hub with the sounder, grey hound, and Amtrak, meeting there as well. The preferred CID is quite far from there. Though I doubt I'd be dissuaded from using the train if that station was built but like how the airport has what seems like a ½ mile walk to the terminal I would ask myself every time I rode it "who thought this was a good idea" Thanks for doing your job and helping to create a transportation system that will outlive us all. I just hope you can take the opinions of those of us who live here now so it will work better for the future Seattleites that will inherit our city.	
12/08/2024	I have several concerns with the potential siting of the CID station(s) but am focusing here on those related to the potential southern station location. Siting a station here would likely cause the loss of rare arts workspace, jobs, and economic development, and contribute to an ongoing loss of regional cultural production. The creation of Inscape created new arts jobs and workspaces. With the likely noise, dust, and vibration from construction, these spaces might be no longer conducive to working, and we risk a community loss of 110 artist studios. Since ST2 construction began behind the building, artists have experienced increase in noise and dust, coming through the single-paned, non-sealing, flap windows. Sound Transit needs to look into mitigation and building improvements, and if that is not possible to support artist tenants in relocation. Increased property valuation from transit is likely to occur. The building is an investment for its owners and they have expressed their rights to change the use to redevelopment into a "higher use." Sound Transit should look at ways to support the arts community and mitigate this potential. Historic and archaeological resources will be put at risk by siting a station here. This former US immigration and detention center contains unprotected artifacts of Seattle immigration history, including the tar graffiti written by detainees on in the exercise yards. Sound Transit has a responsibility under federal and state regulations to mitigate adverse effects to the historic building and these artifacts, which are likely fragile to dust and vibration. Finally, community-oriented Transit Development is proposed to the south of the building, which could potentially harm the historic Chinatown-	Margaret Berger

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	International District community, which features affordable housing for seniors and families. Sound Transit should raise their level of public engagement/decision making in this endeavor so that the neighborhood community determines the results of this development.	
12/08/2024	My name is Britta Johnson. I have rented an art studio at the Inscape Arts and Cultural Center since 2012. I consider myself extremely lucky to have this studio, as affordable, rugged art making space is extremely hard to find in Seattle. My primary medium is stop motion animation; dust, noise, and any kind of shaking are very detrimental to my ability to work. I have already experienced problems with the existing dust from ST2; it's clear that the proximity and scale of the ST3 project would make a huge impact on my practice, and I ask that Sound Transit take my needs into consideration. In addition to impacts affecting me specifically, I join others concerned about the following wider impacts: • Loss of rare arts workspace, jobs, and economic development - more loss of regional cultural production. The creation of Inscape created new arts jobs and workspaces. With the likely noise, dust, and vibration from construction, these spaces might be no longer conducive to working, and we risk a community loss of 110 artist studios. Since ST2 construction began behind the building, artists have experienced increase in noise and dust, coming through the single-paned, non-sealing, flap windows. We ask Sound Transit to look into mitigation and building improvements, and if that is not possible to support artist tenants in relocation. • Increased property valuation from transit. The building is an investment for its owners and they have expressed their rights to change the use to redevelopment into a "higher use." We are seeing how similar development in Los Angeles is affecting the affordability in Koreatown and Little Tokyo. We ask Sound Transit to look at ways to support the arts community and mitigate this potential. • Historic and Archaeological Resources - this former US immigration and detention center contains unprotected artifacts of Seattle immigration history, including the tar graffiti written by detainees on in the exercise yards. We ask Sound Transit to look at preserving these artifacts that are likely fragile to dust and vibration. • Community-oriented Transit Development is proposed to the south of the building, which could potentially harm the historic Chinatown-International District community, which features affordable housing for seniors and families. We ask Sound Transit to raise their level of public engagement/ decision making in this endeavor so that the neighborhood community determines the results of this development. Thank you for your time and attention to these concerns.	Britta Johnson
12/08/2024	Sound Transit Save Chinatown, Not destroy by going on 5th! Go 4th!! We have being working hard to re-vitalize and expand our culture. Thanks Have a great day Tuck Eng	Tuck Eng
12/08/2024	To Sound Transit: My scoping comments are: Extend DEIS comment period to 90 days. 2. Do a social and economic impacts study of station alternatives for the CID. Include impacts such as walking distances on residents and businesses, institutions, health clinics, schools, after school programs, tongs, family associations, and museums in Chinatown, Japantown, and Little Saigon. 3. Study physical, social, equity impacts to	Hal Chinn

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	1200+ elderly, physically challenged non-English speaking residents for each of the alternatives proposed for CID	
12/08/2024	Hi there, I am giving feedback about Sound Transit's planning for disrupting light rail in the CID. Please extend the DEIS comment period to 90 days; 2. Do a social and economic impacts study of station alternatives for the CID. Include impacts such as walking distances on residents and businesses, institutions, health clinics, schools, after school programs, tongs, family associations, and museums in Chinatown, Japantown, and Little Saigon; 3. Study physical, social, equity impacts to 1200+ elderly, physically challenged non-English speaking residents for each of the alternatives proposed for CID; and 4. Drop consideration of 5th Aveneue alternatives because Mayor Harrell has said they are "culturally infeasible to build." Thank you, Mary ~ a better world is possible, Rowen White	Mary Miller
12/08/2024	Dear Sound Transit, My wife and I have 4 scoping comments: A. Extend DEIS period to 90 days; B. Do a study for the DEIS of the cost-benefit analysis of the BLE CID segment alternatives: 4th Avenue, North of CID, South of CID and Original Midtown stations; C. Do an equity analysis of social and economic impacts to the 3 neighborhoods of Chinatown, Japantown and Little Saigon of light rail construction with and without a station for each alternative: 4th Avenue, North of CID and South of CID and Original Midtown stations. D. Do an ADA accessibility study to compare station alternatives for North and South of CID preferred alternatives: 4th Avenue at Union Station, and Original Midtown station. Yours, Francis and Laura Shea	Francis Shea,Laura Shea
12/08/2024	Please act today! Save Chinatown! To Sound Transit: My scoping comments are: Extend DEIS comment period to 90 days. 2. Do a social and economic impacts study of station alternatives for the CID. Include impacts such as walking distances on residents and businesses, institutions, health clinics, schools, after school programs, tongs, family associations, and museums in Chinatown, Japantown, and Little Saigon. 3. Study physical, social, equity impacts to 1200+ elderly, physically challenged non-English speaking residents for each of the alternatives	Kevin Lee

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	proposed for CID 4. Drop 5th Avenue alternatives from consideration. ST board member & Mayor Harrell says they are “culturally infeasible to build." Best regards, Kevin Lee Seattle YFT President	
12/09/2024	This project when completed is going to put live all of us. We need to make the right choices so this line is is the most successful with transit in mind. The rider experience and connectivity needs to be at the top for making decisions. Also we need to have future expansion in mind.	Joshua Karell
12/09/2024	Failing to site a station at the regional transport hub of King Street/CID would be a multi-generational mistake. In order for our region's growth to not result in road traffic gridlock for generations to come, we must have grade-separated mass transit as an accessible/convenient and reliable alternative to driving. The preferred alternative's failure to site a station at King Street/CID fails on all of those qualities: Accessibility/Convenience: every additional transfer required by the mass transit route makes that trip more likely to be taken via car. This is especially so for those using mobility aids as well as those traveling with strollers or luggage. For any trip involving stations on the Ballard to Tacoma line and Amtrak or Sounder, the preferred alternative's failure to site a station at King Street/CID adds the additional barrier to transit usage of requiring a third journey segment (as a transfer to the Everett/Mariner to West Seattle/Redmond line). Reliability: when a trip requires an additional transfer, the reliability of that trip will be decreased, since it requires nothing to go wrong in more places. Given Link's not-uncommon shutdowns and substantial disruptions, and especially considering that it runs at-grade with vehicular traffic for some sections, needing to rely on not just one but two Link lines to both be running normally at once to make a connection with Sounder/Amtrak is a factor that will likely discourage many time-sensitive trips (including commutes) from being made via mass transit under the preferred alternative. Most infrastructure projects create disruption during their construction. While great effort should be invested to minimize those temporary impacts, these should not be done at the expense of foregoing permanent benefits of the project. Specifically: although the preferred alternative may lead to less road traffic during the construction period, the project it proposes to build would be substantially-less compelling of an alternative to driving for many trips, almost certainly leading to increased traffic for generations to come. We should not let such short-term thinking degrade the value of a multi-generational project.	William McGough
12/09/2024	A decade and a pandemic has passed since the original ideas for ST3 were developed. Traffic patterns have changed. With a restart of the BLE project, I suggest to consider the following changes: To speed up construction and avoid Rainier line to lose access to CID Station, focus on Ballard/SLU to Westlake while all other lines use the existing downtown tunnel. (either with a separate OMF at Interbay or single-track connection south of Westlake Station) 2. Update the mode selection and consider shorter automated trains like other transit systems around the world are doing. 3. Consider a 2nd station by the Ballard Library. For more details and alternatives, and input from many riders, please review:	Martin Pagel

Date received	Communication	Contacts
	Focus on SLU and Ballard – Seattle Transit Blog Ballard Link Mode Selection – Seattle Transit Blog Martin Pagel South Seattle resident and transit blogger	
12/09/2024	To Sound Transit: My scoping comments are: Extend DEIS comment period to 90 days. 2. Do a social and economic impacts study of station alternatives for the CID. Include impacts such as walking distances on residents and businesses, institutions, health clinics, schools, after school programs, tongs, family associations, and museums in Chinatown, Japantown, and Little Saigon. 3. Study physical, social, equity impacts to 1200+ elderly, physically challenged non-English speaking residents for each of the alternatives proposed for CID 4. Drop 5th Avenue alternatives from consideration. ST board member & Mayor Harrell says they are “culturally infeasible to build." Steven Yee	Steven Yee
12/09/2024	To Sound Transit: My scoping comments are: 1. Extend DEIS comment period to 90 days. 2. Do a social and economic impacts study of station alternatives for the CID. Include impacts such as walking distances on residents and businesses, institutions, health clinics, schools, after school programs, tongs, family associations, and museums in Chinatown, Japantown, and Little Saigon. 3. Study physical, social, equity impacts to 1200+ elderly, physically challenged non-English speaking residents for each of the alternatives proposed for CID 4. Drop 5th Avenue alternatives from consideration. ST board member & Mayor Harrell says they are “culturally infeasible to build." Sincerely, Changchi hwang	Changchi Hwang
12/09/2024	To Sound Transit: My constructive comments are: Extend DEIS comment period to 90 days. 2. Do a social and economic impacts study of station alternatives for the CID. Include impacts such as walking distances on residents and businesses, institutions, health clinics, schools, after school programs, tongs, family associations, and museums in Chinatown, Japantown, and Little Saigon.	Lai Ping Kimura

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	3. Study physical, social, equity impacts to 1200+ elderly, physically challenged non-English speaking residents for each of the alternatives proposed for CID 4. Drop 5th Avenue alternatives from consideration. ST board member & Mayor Harrell says they are “culturally infeasible to build."	
12/09/2024	As a resident of Chinatown and frequent user of ST Light rail (don't own a car). The 4th Avenue Shallow concept is by far the best alternative for Chinatown. As one who lives in Chinatown, the challenges of construction, detours and closures and other inconveniences associated with construction is a small price to pay for what the outcome of a 4th Avenue station brings to Chinatown and Pioneer Square. Once completed the transportation hub in the CID will be like no other as it will draw people from all regions of King County into Chinatown. The new station will be an enabler for Chinatown to grow and become a go-to place for locals and visitors alike. It will indeed revive Chinatown. The 4th Ave station also provides opportunities to make better use of Union Station and improve the safety around the station. The proposed improvements to Union Station and Plaza will attract people to the area provided that it is a safe and attractive area to be. This area is currently unsafe at night and a place where homeless people congregate during the day. Safety and security must be a priority. The North of CID Alternative is unacceptable to those of us living in Chinatown. I live in Chinatown and when I travel to SeaTac Airport I will either have to walk up hill with my luggage to the North of CID Station (unacceptable long walk with luggage) or I will have to take the Light Rail train north to Pioneer Square Station, then walk to the North CID Station to wait for the southbound train to SeaTac Airport station. Since light rail trains run from 10-15 minutes depending on time of day, the wait time can be up to 10-15 minutes for a southbound train to arrive. The Community and Regional Access graphic that indicates Hing Hay Park to SeaTac/Airport Station of 44 minutes is very misleading and inaccurate. The 4th Ave Shallow Alternative graphic indicates Hing Hay Park to SeaTac/Airport Station of 39 minutes. There is no way that the North of CID station is only 5 minutes longer at 44 minutes! A train transfer at North of CID Station must include not only the wait time for the southbound SeaTac train to arrive, but also the additional walking transit time at the North of CID Station of getting off the northbound train from CID Station and walking to the southbound train line. Therefore, Hing Hay Park to SeaTac should take at least 10 to 15 mins longer from the North of CID Station alternative than from the 4th Avenue Shallow Station alternative. The South of CID Alternative is unacceptable to those of us living in Chinatown. Although a reason given for this alternative is that it “avoids direct station construction disruption in CID”, such reasoning is extremely shortsighted and short-term thinking. It absolutely makes no sense to have a second station in Chinatown that is only 4-5 blocks from the existing one, for the sake of avoiding some construction disruption in the CID. One must look at the big picture, or think in the long term, as to what is best for Chinatown and its future (next 100+ years), and not be concerned about construction disruption which is very short term thinking. A centralized station such as the 4th Ave Shallow Alternative with the existing CID station will be a constructive force (not a disruptive one like	Donald Liu

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	the I-5 construction which separated Chinatown) bringing more people into Chinatown, to live, to work, to visit which will help Chinatown grow and prosper. As a Chinatown resident, accessibility to just one central station in Chinatown is foremost. Having two separate stations just blocks away makes no sense at all. The location of the South of CID station has many disadvantages. Its location is in area of high crime, drugs and homelessness. The location of a major gas pipeline and high voltage lines is a safety concern. A public train station should not be in such close proximity to such hazards and danger (think also potential for terroristic acts). My comments above ultimately affect the environment of Chinatown. Chinatown is now the crime capital of Seattle. More has to be done to revitalize Chinatown and make the area safe for residents like myself. Expanding the existing Chinatown station to include the 4th Ave Shallow station will help reinvigorate the heart and core of Chinatown, as well as its businesses. Respectfully submitted, Donald Liu A long-time Chinatown resident	
12/09/2024	Extend DEIS comment period to 90 days. 2. Do a social and economic impacts study of station alternatives for the CID. Include impacts such as walking distances on residents and businesses, institutions, health clinics, schools, after school programs, tongs, family associations, and museums in Chinatown, Japantown, and Little Saigon. 3. Study physical, social, equity impacts to 1200+ elderly, physically challenged non-English speaking residents for each of the alternatives proposed for CID	Brien Chow
12/09/2024	Please find the PDF attachment containing my public comments on the Scoping for the Ballard Link Extension (BLE), in your efforts to publish a Draft EIS for the project. Included in the document are various comments regarding the BLE segment, in addition to a Systems Inefficiency Analysis comparing a potential alternative in ST's Link buildout to the design of other major rapid transit systems around the country. I hope you find my comments and analysis informative and helpful as you move forward on this project. Thank you for your time and consideration in your review of my thoughts, and all other comments submitted from other parties. I'm happy to be of further service or answer any questions. "Be kind, for everyone you meet is fighting a battle you know nothing about." ~Wendy Mass Paul R. Sweum, Designer & Fabricator AZWAglassworks	Paul Sweum

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	Paul R. Sweum 217 185th Ave SE #111-206 Covington, WA 98042 AZWAglassworks@gmail.com December 7, 2024 Board Administrator & SoundTransit Board of Directors SoundTransit 401 S. Jackson St. Seattle, WA 98104 Re: 2024 BLE scoping process - public comment period Dear Board Administrator, Chair Constantine and Board members: I bring this to your attention as a resident who's lived in eastern King County for the majority of my adult life. I was raised in south Bellevue and attended school there. I've studied and worked in urban planning since the 1990s; being employed by and collaborating with community associations, small towns, cities, counties, special districts, tribes, State and Federal agencies. In the current scoping process for the Ballard Link Extension (BLE), I'll give perspectives on potential alternatives for Link light rail planning (specifically station placement in the Chinatown/International District [CID] area) in addition to other recommendations for BLE scoping. It is my hope that Sound Transit ("ST" or "agency") lands on a solution that serves both regional riders with maximum efficiency on the overall Link system, in addition to minimizing adverse impacts to the local CID historic district – making an effort to mend its adversarial relationship with the community – to work towards opening doors to future collaborative efforts, should such possibilities materialize. I. Initial comments Future consideration and capacity planning with a 3rd downtown tunnel The region is already looking at increasing capacity and potential bottlenecks with train sets when you merge the 2 Line from the Eastside with the current 1 Line in the Seattle/Snohomish County portion of the trajectory. It's not a stretch to see 2 Line capacity, in addition to other future potential Link extensions, necessitating additional tunnel dedication past ST3 projects; crunching numbers on future riders and capacity needs should reveal as such. I would just ask you, at this time, to consider that in current analyses to avoid any short-sighted miscalculations in line & station planning that could present difficult fixes in the future. Some ideas to this effect have already been explored by Seattle Subway. Although I don't necessarily concur 1 with all of the aims in their proposal, as a comparative analysis I believe there's value in considering their ideas. II. CID station area alternatives to CONSIDER for scoping #1 for CONSIDERATION: 4th Ave Shallow station In terms of connectivity to what I refer to as the King Street Station/CID hub (or "supernode," another descriptor I often use) from a planning and long-term transit perspective this is the most optimal solution. All Link lines achieve maximum potential efficiency in connectivity; creating seamless transitions between Link light rail, the bus system, Sounder commuter rail, Amtrak, Seattle street car and ferry terminals. I don't know how potential high speed rail would fit into this, but it should… but for	

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	now, the regional transit system – as intended by the voters under ST3 – will be best-served in this alternative. While construction will have some impacts on the Chinatown Historic District, no structures will be destroyed nor affected within the actual footprint of the district. The end product of this alternative, however, will greatly benefit the CID community by bolstering its connectivity to this improved supernode. Moreover, this alternative presents a fantastic opportunity to make transit, vehicular, and pedestrian mobility at this location dramatically safer. Link and transit connectivity benefits aside, this alternative resolves critical life & safety issues by rebuilding centuries-old seismically compromised infrastructure of raised streets at the location – all in desperate need of attention. "...it is important to note the following infrastructure will need repair and replacement in the timeline of construction or early years of operations of the new light rail lines funded by ST3: the 2nd Avenue Extension Bridge (built in 1928, poor condition in 2019), South Jackson Street Bridge (built in 1910 and updated in 1987), and the 4th Avenue Viaduct (built in 1910)." "It does not strike us as wise to eliminate the promise of creating a properly connected regional hub in order to save construction on 4th Avenue, when construction on 4th Avenue will have to be completed regardless of what Sound Transit does." Projected costs and the inconvenience of construction timelines have been acknowledged, documented, and highlighted as concerns for this alternative on numerous occasions – in public ST subcommittees, Board meetings, and through my personal conversations with ST officials. Interestingly enough, additional attention to this alternative materialized through a recent report by a ST "independent consultant" (previously a TDLE engineer on ST's payroll, as I understand it) to the ST Expansion Committee on 11/14/2024, which appeared to be an ill-conceived effort to assassinate this 4th Avenue Shallow station alternative. I've read through literally hundreds of engineering reports and technical memorandums over the years, and this one was… almost entertaining, but more uninformative and wanting, to say the least. The problem with this sort of commissioned task-specific report – in its patronizing, terse content and laser focus on perceived obstacles, construction timelines, and a general no-can-do approach – is how it reveals its true colors in its narrow scope and failure to advise with (or even introduce, for that matter) the idea of proven solutions to potentially bolster any pathway of success for the station construction parameters in question. Forget informing ST Board members that any potential solutions exist in the first place, or may be worthy of further investigation, in the interest of borrowing ideas from proven methods to patch together a can-do strategy. It is my hope we think bigger in our solutions – in this effort for Seattle's regional rapid transit system now spanning over a half century – to realize its maximum design potential and the successful delivery of a stellar, state-of-the-art, efficient, world-class light rail system that is the envy of other cities. Let's try something novel for a minute; a focus on ideas and a glass half-full approach in the best interests of what the Puget Sound region actually voted for and approved in 2016's ST3 ballot measure. There are numerous examples of transit and construction projects in the United States and around the world that have dealt with poor soils, political	

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	acrobatics with entities like railroads, seemingly insurmountable engineering challenges, and certainly the challenges of rerouting traffic and the related inconveniences through such a megaproject. Some examples include: Metro Line 52, Amsterdam, Netherlands… poor soils, complex politics, construction delays, special tunneling techniques used to protect historic structures (opened July 2018) 150 North Riverside, Chicago, IL… a 54-story skyscraper constructed on a 2-acre site in the West Loop, with 75% of its acreage dedicated to railroad corridor and easements (completed in 2017) Japan… geosynthetic-reinforced soil structures for railways (article from March 2014) There are engineering and planning professionals out there – including Sound Transit staff more informed than I – who are more than capable of cobbling together examples and solutions to this effect. Can we be more curious and creative? All points and examples aside, a hard fact still remains… however you pick to take your medicine (or in this case wherever you pick it), there are bound to be disruptions when you build a transit system after the rest of the city has been constructed. If a pragmatic approach suggests we take our medicine before having our ice cream – why not pick the option that results in the best long-term solution? A city can recover from closing a street for construction of a transit station, but it's way more difficult to recover from a poorly designed transit system. While it presents inconveniences and disruptions during construction, the short-term impacts of traffic are ultimately negligible when compared to the number of riders that can be attracted to the upgrades, streamlined connectivity, and maximized efficiency of a well-designed transit system. What is ironic about this, along with the perceived reticence of the agency to pursue the 4th Avenue Shallow alternative, is that many construction-related concerns in this endeavor bring into account the short- and near-term inconveniences involving auto mobility – traffic, parking garages, street access points, etc. – precisely the root problem the transit system is being built to resolve in the first place! This is about managing expectations. I'll argue that Seattle & King County residents can work with impacts and delays from construction – even protracted, difficult construction – if they know a quality solution will be waiting on the back end. This has been proven in recent times, literally a few blocks away. In the last decade Hwy 99 on the Alaskan Way Viaduct was successfully converted into a tunnel, with a rebuilt seawall and world-class amenities. It transformed the city for the better with road and pedestrian safety, creating new business growth, bolstering tourism, while opening up access to the waterfront and Pike Place Market. This is a perfect example of taking the medicine before the ice cream – tolerating essentially a decade of construction – with fantastic results, and to great fanfare. Expectations are managed. Everyone goes home happy. Let's also remind ourselves – we're not building an efficient transit system for "us" – we're building it for future generations. If fear of railroad behavior and its imposing delays during construction weighs so heavily on the Board's mind; then dangle a carrot, or hire a coordinating specialist, further cultivate working relationships, use different intermediaries, buy someone a steak dinner, or cut a better deal. Just think outside the box. As I mentioned earlier, there's other success stories out there; railroad relations, poor soils, and timelines should not	

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	dictate, nor shape a decision of this magnitude for literally millions in our region. All things considered, in the end the claim of wanting to avoid construction impacts feels hollow, and it's not a particularly compelling argument to avoid building a crucial transit hub that will impact the region for generations – easily 100, 150, 200, or more years – not exaggerations in arcs of time. A well-designed transit system called for by the voters, public safety with a rebuilt 2nd Ave Extension/Jackson/4th Ave Viaduct and improvement to the efficiency of the transit network – resulting in a improved supernode and ultimately increased ridership – outweigh construction challenges, timelines and costs that can be addressed with determination and well-informed, creative solutions. I not only implore, but challenge the Board to see past these aforementioned challenges for the 4th Avenue Shallow alternative, and to harness the political will to meet its responsibility to the voters. Note: per my initial comment… in theory a 4th Avenue Shallow alternative could be kicked down the road for a future 3rd tunnel option (which leads to my suggestion #2) – but if you take your medicine now, like I'm suggesting with all the opportunities and life & safety considerations for fixing this corridor despite a longer construction timeline, I'd strongly consider making this your top CID area station priority for this project. #2 for CONSIDERATION: 5th Ave Deep (sort of?) station This potential alternative concept was included in the WSBLE Draft EIS in 2022 as alternative CID 2-b. Content explaining this option stated: "An underground connection would be provided to the northbound platform at the existing station. The tunnel and station would be about 180 feet deep, approximately 90 feet deeper than Alternative CID-2a, which would allow the station to be mined rather than constructed using cut-and-cover methods and would reduce surface disturbance during construction." I haven't seen a high enough level of detail on that proposed alternative to be able to determine to what extent adverse impacts would be brought to the CID neighborhood or structures adjacent to 5th Ave. Is it possible to reboot a form of this option and tweak it to eliminate condemnation of structures in the Chinatown Historic District, and does it really need to be 180 feet deep? In terms of proximity and alignment with the current CID Link station next to Union Station, this appears to achieve very satisfactory maximum Link system efficiency between tunnels and transfers. It also does not present as many complexities during construction, or a potential decades-long timeline, like the 4th Avenue Shallow Station alternative. I'm picturing the layout for this tunnel right below the 5th Avenue alignment… I'm not a transit or systems engineer, but I'd be curious to know if it's possible to use the current CID station entrances to access this new tunnel, if it's staggered at a lower level under 5th Avenue from the current CID station platform (think of a California split residential layout, perhaps with some overlap) and accessible by necessary and/or upgraded vertical conveyance systems. In addition, to make it more accessible and cut down transfer times, perhaps it doesn't need to be as deep as the aforementioned proposed alternative from the WSBLE Draft EIS. Perhaps modifications to the current CID station, such as east platform expansion in the direction of and under 5th Avenue (for access to the lower line and bolstering the vertical conveyance equation with additions to accommodate circulation) would allow riders to make the descent into a lower level (mined) new tunnel central platform and its bi-directional Link lines.	

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	Moreover, if this option involves tunnel mining and minimal surface intrusions (adjacent to the east platform of the current CID station & 5th Ave) with no disturbance to the Chinatown neighborhood beyond partial/intermittent 5th Ave street closures, it appears to achieve the best of all worlds: an ultra-efficient transfer to the current CID Link station, serving the CID/King Street station supernode, a shorter construction timeline (opposed to concerns with the 4th Avenue Shallow Station alternative) and a means of proximity for an underserved local community – and doing so with no adverse impacts to the Chinatown Historic District and structures within it. III. CID station area alternatives to ELIMINATE from scoping #X1 to ELIMINATE - North/South of CID Stations alternative The North/South of CID stations alternative was deemed the "preferred alternative" in a ST Board decision on 3/23/2023 regarding the WSBLE Draft EIS, prior to this scoping process and after the project split into the two WSLE and BLE segments. If played through to adoption in its proposed alignment, this alternative adds out-of-direction scenarios with additional travel time of 10-20 minutes for a 2 Line rider from the Eastside trying to reach the 1 Line to connect with the current CID/King Street Station supernode or further south to SeaTac airport and beyond (this also applies to the opposite direction with out-of-direction travel). Working within such a design of the Link system, the idea of riders being required to take inefficient pathways like this lands somewhere beyond unconscionable – and is counterintuitive to what the system is built to do in the first place – take riders from the places they live to the places they need to get to in the most efficient manner possible. It's also worth pointing out that in this station placement scenario, the system design leaves a rider potentially choosing the clunky alternative of leaving the system from the incoming 2 Line south of CID, then bumping to surface streets to negotiate several city blocks before descending back into the system at the currently existing CID station to take a southbound train on the 1 Line to SeaTac airport and other locations south of the CID. This is not only inefficient, inadequate, unsafe, and cruel to folks with mobility issues and children – but in the larger picture an unfathomable disservice to riders across the region in future generations. Needless to say, this so-called "alternative" also defeats the core purpose of a rapid transit network, since the whole point is to move every rider throughout the region in the most efficient way possible without having to physically leave the system – and certainly not to leave the system and venture surface streets for three blocks – simply to enter into it again. This alternative also bumps the location for what would be a Midtown station further south on the line, deviating from a critical station location presented to the voters as an ST3 concept. This configuration will introduce potential bottlenecks and choke points in the downtown tunnel at the Pioneer Square and Westlake stations, since additional out-of-direction riders going between King Street Station/Seatac airport and the Eastside will add unnecessary congestion to the system – when they could have caught the other line at CID or simply left the system at that same location for their destination or transfers by other means at the supernode… and this isn't beginning to contemplate the impacts of soccer, football, baseball, and concert events at the SODO stadiums. The N/S CID Stations alternative flies in the face of best planning practices, thwarts common sense connectivity for intermodal transportation hubs, brings up fundamental safety concerns for riders, compromises transit equity and may violate Federal law and/or guidelines called out in the Intermodal Surface Transportation Efficiency Act (ISTEA)	

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	of 1991 and Federal transportation equity policies. It is critical for ST to evaluate what is at stake in this situation not just for the aforementioned concerns – but also to determine if the agency is potentially jeopardizing its ability to secure future Federal grant monies that may be withheld for reasons involving these accounts of potential gross negligence in this matter. Efficiency in design is not a novel concept for these systems. These are the ABCs of transit planning. Rapid transit systems have seen buildout with success, under constraints way more difficult than these, in scores of other metro regions for 100+ years – utilizing best available practices and techniques in planning, design and construction. To figure out if and how the N/S CID Stations alternative presents an anomaly of inefficient out-of-direction travel among its peer transit agencies, I performed an assessment to compare SoundTransit's Link buildout to over 15 other systems in major metro areas in the United States (and one in Canada); including light rail in Portland, Sacramento, Los Angeles, San Diego, Phoenix, Minneapolis and Dallas; rapid transit in Atlanta, Vancouver BC, the Bay Area BART and Washington DC; and legacy rapid transit systems in Philadelphia, Chicago, New York City and Boston. Even with any analysis oversights, errata or significant transit systems not included in this analysis, the point of achieving system efficiency for the best possible deliverable to the regional voters still stands. In this analysis, a singular fact was revealed – should SoundTransit proceed with this N/S CID Stations alternative – it will carry the distinction of being the only rapid transit system on the North American continent with inefficient out-of-direction travel built into its line design from a terminus to a critical system transit hub (see the accompanying spreadsheet at the end of this document for analysis details). Please read that prior paragraph again and allow it to sink in. I have made my perspectives clear on this alternative and the catastrophic, generations-long domino effect it would set into motion. I would think, and hope, enough additional concerns have also been brought up outside of my comments; including from other transit planners, engineers, stakeholders, decision-makers and members of the public. Simply put, choosing this alternative would be an exercise in gross negligence and set into motion a negative domino effect for decades to come that's implausible for contemplation. Please drop this alternative from consideration in this BLE scoping process… without hesitation. #2X to ELIMINATE - 5th Ave Diagonal CID Station alternative This potential alternative concept was included in the WSBLE draft EIS in 2022 as alternative CID 2-a – then removed at some point – and then, once again, it was reintroduced in November 2024 as a possible station option for this BLE scoping process. If it was not being dropped inside Seattle's Chinatown-International District, a designation in the U.S. National Register of Historic Districts, under normal circumstances I might see this as a potential opportunity for a Link station location. From a system efficiency standpoint, this does achieve satisfactory tunnel & surface transfer points for the transit system supernode in that area. However, the adverse impacts it presents to the CID and Asian community deem it an unacceptable alternative. When a project like this is proposed within a registered historic district, the NEPA process involves a heightened focus on the potential impacts	

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	to buildings and the character of the district, primarily through a "Section 106" review which is part of the National Historic Preservation Act (NHPA). The process must thoroughly analyze and evaluate all potential cultural resource impacts; historic properties, sacred sites, traditional cultural practices, archaeological sites, in addition to impacts on intangible cultural values and community identity, to name a few. In this process, agencies must consult with affected groups to understand potential impacts and devise mitigation strategies when proposed actions have adverse effects on those groups and resources… and that just begins to skim the surface of requirements. That said, I'd strongly suggest the agency take a deep dive into the NEPA & Section 106 part of this process to visualize where it will go and see if it's even viable to begin with; forecasting potential time, treasure, headaches, and negative political fallout from it being triggered and pursued to a conclusion. NEPA processes aside, the adverse impacts of construction to the Asian community living in this registered historic district – a transit station alternative proposing the razing of structures and businesses, in addition to acute construction impacts – are difficult to contemplate, let alone justify. Having previously worked for Tribal communities, I'm no stranger to bearing witness to systemic bullying of historically disenfranchised communities – be it intended or not. The protests by the CID community in this process are easily justified by the gut punches this community has been dealt over its historical arc – the systematic shrinking of the CID, the construction of Interstate-5 bulldozing and bisecting the community, promises not kept from the process surrounding the current CID station, exclusion and not having a seat at the table, wrongful incarceration, and a centuries-long parade of racially motivated hate crimes – to make mention of just a few. This historical arc, and these facts, should not be lost on the ST Board. Moreover, these accounts should factor into the decision-making process for a Link station location in the CID area in a very relevant way. This 5th Avenue Diagonal station alternative only adds fuel to the fire, and exasperates an already adversarial relationship between ST and CID-based community groups that is solely of the agency's undoing. Speaking from an observer's perspective regarding my immigrant and Asian friends… an immigrant's journey is beset with perils and a steep learning curve for assimilation into American life. It requires a brave constitution for those who travel it; something few privileged American citizens generations-removed from the immigrant experience can relate to or clearly understand. The CID community is a familiar and safe place for them to land. Many of the CID storefronts, like the ones potentially set for the wrecking ball should this alternative see its conclusion – while providing low rents and the means to realize small business growth – not only represent the livelihoods of their owners, but springboards for immigrant communities to propel their way to a successful future. Our systems and programs should be designed to give them support and lift them up – not eliminate the means to establish themselves – means in short supply, and with finite alternative options. Needless to say, this proposed station is not helpful in this regard. It will kill upward mobility and pathways to dreams trying to be realized. Furthermore, what good is it to build a transit station if you're wrecking the heritage and culturally identifiable places of a community the system's supposed to bring you to in the first place?	

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	I'll argue that it completely defeats the purpose. Contemplating what is proposed to be taken away on the front end of station construction: at 6th Ave & Weller, a unique structure with a blue roof facade (the former site of Uwajimaya) containing businesses such as Oasis and Jollidaze Cafe; at 5th Ave & King St, Joe's Bar & Grill, a Rice & Hot Dog business, Seattle Best Tea Co., Ping's Food Market, UmmaDak Homestyle Korean Fried Chicken – all within spitting distance of the Chinatown Gate – and all part of the essence of a pedestrian's entrance into this welcoming, unique cultural experience for residents and visitors alike… and this is merely a cursory inventory of what is viewable from the street. Normally, conventional thinking on problem-solving suggests this brings an opportunity for atonement; for the agency to explore a course of partnership with the CID community on the back end of any modifications being made to the blocks in question. Certainly, this alternative does not present a typical TOD scenario, nor should it. For example, under friendlier circumstances ST could involve community groups through TOD so they may be shaped to fit the context of the historic district and set in motion culture-oriented priorities and needs. Ideas for programs and development could be fleshed out and flourish in a collaborative effort with agreements or some sort of framework that embraces cooperation, seats at the table for all stakeholders, community oversight, and the exercising of best behaviors by everyone involved… as one might think. Unfortunately, Sound Transit has not done itself any favors in the adversarial relationship it has sown with the Asian community in the CID. At this juncture, I fail to visualize how the agency would even navigate any possibility of reconciliation – a problem the onus is solely on the agency to fix. Considering a shaky foundation for trust and a history of promises not kept, any handshake deals are obviously out of the question. This behavior by the agency is further evidenced by the waffling of city and ST leadership on whether or not to pursue this alternative in the first place; it's on the books, then off… then back on again? I would have expected better from ST, which is either confused and rudderless, or playing a shell game with station placement driven in part by external forces. Either way, the agency has been completely tone-deaf to the CID community… the whole thing is strange. Moreover, the bad optics of this – which add to the unrelenting, centuries-long poor treatment of the Asian community – take shape as cruel, underhanded, and disturbing on a sinister level. Because of this history (and I'm sure there's more I'm unaware of), I'm highly skeptical such an opportunity would be pursued in an effort appearing in good faith – assuming the agency would even feel compelled in the first place – which is really unfortunate, as sadly it torpedoes what might otherwise be a colossal opportunity to reverse a long history of blunders and ill treatment of the CID community by the transit sector of government. While I applaud Sound Transit for delivering a mostly safe, carbon-fee and trip-efficient transit system to the region so far – the agency has a steep hill to climb in learning how to be a good neighbor –especially with disenfranchised groups. These folks – our Asian brothers and sisters – should have a right to go about their daily business free of intrusion, retain an intact and evolving community of their own accord, modify it for betterment as they see fit, maximize wellness and cultural purpose without anyone blocking their way, and live their lives under a historic district's protective umbrella to assist in self-determination. The functions of government should serve to improve communities like Seattle's	

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	Chinatown-International District – not force edicts by chokehold, impose limitations, wreck things, erase culture, or cast a spectre over lives. Was it really that much of a far cry to extend an olive branch and seek successful outcomes for the CID community and all the stakeholders involved? What happened to a success-for-everyone approach? I challenge the agency to do better in the future. In the meantime, ENOUGH. Please drop this alternative and find another way. IV. Additional & design-related comments CONSIDER for EIS: Acknowledgment statement regarding CID community As part of an endeavor to make amends with the CID and its Asian community, a statement similar to the acknowledgment of the Native American tribes and their lands in the TDLE Draft EIS (issued Dec 2024) could help to improve relations and document good intentions on the part of the agency. This is suggested as an olive branch for a very unique set of circumstances – we're not talking about a small kerfuffle with a single property owner or business over a Link guideway or station placement – this is a protracted situation involving a historically disenfranchised community and location designation in the U.S. National Register of Historic Districts. Considering the adversarial relationship and aforementioned accounts with the CID community from the previous section, a statement by the agency – submitted, for the record, in this forthcoming EIS process – can signal a good-faith effort to stay the course on a framework of better understanding and cooperation. In the larger picture, this is a modest ask that could go a long way. As a potential fresh starting point, it can trigger a big return through a small effort, and hopefully sets into motion a larger endeavor by the agency in simply "doing the right thing." CONSIDER for SCOPE: Retain the Midtown Station As mentioned prior, the Midtown Station is retained when the N/S CID alternative is abandoned. This station is at a location critical to the Link network and will address a part of town currently underserved, including providing better access to the medical facilities on First Hill. This station concept was part of the ST3 proposal that informed the voters in 2016, and as should be delivered as promised. CONSIDER for SCOPE: Designs for central platforms in 2nd Link downtown tunnel This may go without saying, but I encourage you to consider the feasibility of a central platform for the new Link light rail tunnel. I don't know if this will make much of a difference in transfer times, but I'm guessing it makes the most sense for minimizing the width of the station in the tunnel. It also provides the opportunity for quick cross-platform transfers, should the need arise for a rider. V. Final thoughts Finally, I'd like to with you some thoughts on the importance of your role as decision-makers, especially in guiding a transit agency with a regional footprint. Urban planners – whether they're certified or not – all follow a Code of Ethics. We first learn this in our college planning programs. Its emphasis and importance to our work only deepens with our professional experience, through the scenarios and challenges thrown at us. The Code of Ethics should be part of a planner's DNA, and helps the trained professional to separate collaborative, thoughtful, well-crafted planning	

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	from negligent or misguided processes that could end in potentially catastrophic results. While certified planners are bound by these Ethics in AICP, I would argue that a Board of decision-makers stewarding and guiding the works of a regional transit agency is not only also bound by those same type of ethics – but moreover, their role in carrying out those ethics in the public trust is even more critical. The following lists the AICP Code of Ethics and Professional conduct from Section A, "The Principles to Which We Aspire": 1. People who participate in the planning process shall continuously pursue and faithfully serve the public interest. 2. People who participate in the planning process shall do so with integrity. 3. People who participate in the planning process shall work to achieve economic, social and racial equity. 4. People who participate in the planning process shall safeguard the public trust. 5. Practicing planners shall improve planning knowledge and increase public understanding of planning activities. The AICP Code of Ethics and Professional conduct was revised in 2021. In spite of my criticisms today, I see myself as a cheerleader for Sound Transit's mission, purpose, and the game-changing deliverables in transit solutions it provides the central Puget Sound region. As merely a single voice in the public, I write letters to FTA officials and the U.S. Transportation Secretary – anything to help prod along efforts to secure funding – and plan on continuing to do so… but I will also comment to the agency to bring to your attention what I see as potential mistakes, oversights, or errors in judgment. I believe all the stakeholders in this project are striving for the best quality deliverable for our region, in this Link light rail expansion process. To build it takes decades, and while some messy scenarios along the way are inevitable, hopefully they're resolved while serving as teachable moments for all involved. However, how we go about it – with the effects on our environment, community resources and welfare, historic treasures, unique places, and the balance of impacts on human lives in that process – is even more important. I'm happy to answer any questions and be of further assistance. Respectfully and with gratitude, Paul R. Sweum transit & rail advocate | town planner | technical writer | author VI. "Transit Systems Inefficiency Analysis" spreadsheet (see pp. 13-14)	
12/09/2024	Extend DEIS comment period to 90 days. 2. Do a social and economic impacts study of station alternatives for the CID. Include impacts such as walking distances on residents and businesses, institutions, health clinics, schools, after school programs, tongs, family associations, and museums in Chinatown, Japantown, and Little Saigon. 3. Study physical, social, equity impacts to 1200+ elderly, physically challenged non-English speaking residents for each of the alternatives proposed for CID. 4. Drop 5th Avenue alternatives from consideration. ST board member & Mayor Harrell says they are "culturally infeasible to build."	Amy Chen Lozano

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12/09/2024	My family owns and operates an apartment building at 408 Aurora Ave N. The proposed construction of the underground station at Harison and Aurora (7th Ave) has the potential to cut almost all access to our building. I hope you will consider moving that station or constructing it in a way that minimizes the impact to pedestrians. We offer some of the most reasonably priced apartments in that part of town and we would not survive being cut off from that access point for multiple years of construction. Thank you, Matt Clark	Mathew Clark
12/09/2024	We prefer that the station be located elsewhere than Harrison and 7th. Ave. N., but if it must be, please be sure that there is good pedestrian access to our apartment building at 408 Aurora Ave. N. from the south. That will be vital to us.	Chris Clark
12/09/2024	The environment for Ballard Link and the second downtown Seattle tunnel (DSTT2) has changed dramatically since the ST3 vote in 2016 and the initial Draft EIS. Transfers between the two tunnels (1 Line to/from 2/3 Lines) have unacceptably long walks and level changes -- far more than peer subways. This was not disclosed in the ballot measure: it implied the stations would be at the same level as the existing stations and transfer walks would be normal for a subway. Normal means around 3 minutes or less -- not 8 or 10 minutes. That threatens the line's ridership and usefulness, since half the destinations will require a transfer downtown. 2. The likelyhood of overcrowding without DSTT2 was always debatable. Now with work from home it seems less likely. The biggest bottleneck is between Westake and U-District stations, which DSTT2 would not address. 3, ST should pursue the ST3 candidate project to upgrade the existing tunnel (DSTT1) instead of building DSTT2. That would raise the maximum reliable frequency from 3 minutes to 1.5 minutes, giving plenty of capacity for three lines in the tunnel. (Tacoma Dome-Lynnwood, West Seattle-Everett, Redmond-Mariner.) Ballard-Westlake would be a separate line with everybody transfering at Westlake. 4. ST should add an alternative with an AUTOMATED Ballard-Westlake line. Automated lines have become the international standard for new lines. An automated line would both be less expensive to construct AND could run at ultra-high frequency (every 2-5 minutes) without signfiicant extra costs, as the Vancouver Skytrain does. The lower capital costs would come from smaller stations, smaller trains, and a smaller tunnel. 5. Sound Transit should leave an option for the automated line to be extended southeast in a future vote, serving First Hill and Little Saigon, and possibly North Rainier to Mt Baker station. 6. Alternatively, Sound Transit could extend the automated line south in the DSTT2 corridor and continue to West Seattle, replacing the West Seattle Link project. This again would significantly reduce construction costs compared to ST's current preferred alignment, and might give smaller stations more freedom to have closer transfers with DSTT1 stations. 7. Sound Transit should also consider the No-Build Alternative to Ballard Link, as a way out of the usability and cost dilemmas that emerged after the vote and were not in the Representative Alignment in the ballot measure.	Mike Orr

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	8. Sound Transit should add a bus alternative for Ballard Link to complement the No-Build Alternative, addressing the corridors of King County Metro routes C, D, 15, and 40. RapidRide C & D improvements are already in ST3, so that could be a starting point. 9. Delete the 14th Avenue NW Ballard station alternative. It's a long walk from the center of Ballard's density where the bulk of riders would be walking from. 10. Add an underground Ballard station alternative around 20th-22nd Ave NW to serve the center of the urban village.	
12/09/2024	Two items I forgot in my last feedback. 11. Keep the 4th Avenue Shallow and Shallower CID station alternatives in the EIS. This is the best for passengers after the 5th Avenue Shallow alternative in the representative alignment. 12. DO NOT PURSUE the "CID/N - relocated Midtown" or "CID/S - Dearborn" station alternatives in the preferred alignment. These have unacceptably long transfer walks to their counterpart stations in the existing downtown tunnel. CID/N is also too long a walk to CID destinations. The "Dearborn" station platforms are significantly further south than the Dearborn Street station entrance, adversely affecting both transfers to the 1/2 Lines and walks to CID destinations.	Mike Orr
12/09/2024	Another thing I forgot. 13. Keep the The 5th Avenue Shallower DIAGONAL alternative in the EIS. It and 4th Avenue Shallow(er) are much better than the "CID/N - relocated Midtown" and "CID/S - Dearborn" alternatives both for transfers and for walking to CID destinations.	Mike Orr
12/09/2024	I am an artist with a studio at Inscape 815 Seattle Blvd South. I mostly ride the bus a lot to and from the studio and would like to know how routes will be impacted before, during, and after construction. My main routes in and out of the studio are by bus (62, 28/5, 40) and driving via 99. As a pedestrian I am concerned about safety (cars, dust, construction) to and from the studio during construction and after. I would like for the station to improve the pedestrian experience in the area around the building. I'm concerned about the impacts of rerouted/disrupted transit on local businesses and elders. I would like to know about noise and dust pollution during construction - will working at Inscape be hospitable/safe? How will the external features of the historic building be protected? I'm concerned about the future of the building as a relatively affordable space for artist studios. I would love for the project to be an opportunity to invest in arts & cultural spaces. Generally I'm concerned about the impacts of housing affordability with the proposed stations.	Emily Turner
12/09/2024	both the Proposed & Preferred route alternatives from downtown through Seattle Center and over to Elliott/15th Ave call for a cut and cover tunnel. The Republican St. Alternative (currently identified as preferred) involves creating tunnel portal on a sensitive slope with documented landslide history, and will completely divide the Uptown neighborhood for multiple years. The Mercer St alternative is superior in terms of both grade and curve for the tunnel portal exist, combined with not impacting a sensitive slopeâ€¦ but has other considerations. Either alternative could be significantly improved - and cause much less risk and negative impact to Uptown neighborhood by implementing a deep bore tunnel, as has been used previously by Sound Transit. Why has this alternative not been considered in the design & planning efforts?	Gary Roshak

Date received	Communication	Contacts
12/09/2024	Hi Sound Transit, Since we are spending billions of dollars to construct the Ballard link, we should make it convenient for commuters to navigate so that they will use it. I believe that the new light link rail stations that will be part of the Ballard link should be positioned so that the rail system as a whole functions as an integrated whole that is convenient and efficient for commuters to navigate. With respect to the station in the international district, this station should CLEARLY be adjacent to (or below?) the existing Light Link international district station and King Street Rail station. Commuters should not be forced to walk five blocks or more (as they would if either of the other two station locations are used), thus incurring delay and inconvenience if they want to access another line of the Light Link system. This will motivate them to avoid using the system. The availability of other sites in the general vicinity should not be allowed to decide this important issue. I know less about the pros and cons of the proposed positions of the Ballard station. However, I believe that the most efficient system for commuters should determine where stations are located. With regard to the scope of the future EIS, I am not sure about how this process works. If a particular proposed station location is not evaluated in this EIS that will soon be under way, will that location be dropped from consideration? If so, I believe that the most commuter-friendly of the proposed station locations should be included within the scope of this future EIS even if that location has been covered in a past EIS. Sincerely, Rosemary Sweeney	Rosemary Sweeney
12/09/2024	The Project Purpose and Need statement should emphasize the need for easy connectivity between lines and among modes and that the user experience should be paramount in the project design. The Chinatown-International District location is the major transportation hub for the region. People will transfer between Amtrak, Sounder, multiple Link Light Rail lines, streetcars, buses, and taxis. Travelers will also have a lot of baggage and maybe small children. There must be a convenient and easily navigated pedestrian connection among King Street Station, the current Chinatown-International District (CID) station, and the new Link platforms associated with the WSBLE project. I support moving planning forward with the 4th Ave S. Shallow Station and 5th Ave S. Shallow Station alternatives, with particular attention to making the additional CID station as shallow as possible, with good connections to the existing CID station platforms. A recent consultant report indicates that the 4th Ave shallow station will take 12 years to build and may have construction delays due to BNSF. These issues can be mitigated and the whole project is not scheduled to be open till 2039 so getting the CID station in the right place on 4th or 5th Ave will not delay the whole project. With 2 million more people in our region in the next 20 years we need to have a world class transit system which keeps people using transit not cars. We need this for equity, environmental and land use issues. I had thought that we were settled on the 4th Ave. shallow alignment then new politicians are elected and voter promises are undone. This is very frustrating to voters and makes me not trust the process. A connecting concourse could be either overhead or underground to provide safe passage across busy 4th Ave S. and the mainline railroad tracks. The brand new "preferred" alternative must be dropped and the only	Arvia Morris

Date received	Communication	Contacts
	alternatives should include a new station very close to the existing International District Station and King Street Station (Sounder and Amtrak) for ease of inter-connectedness. Another alternative that could prove helpful is to study an alignment that merges the Ballard line into the existing downtown transit tunnel and uses that routing underneath 3rd Ave instead of building a new tunnel underneath 5th Ave. Various operational efficiencies would be needed to run more trains through the existing tunnel but this may prove more cost effective than a new tunnel. Thank you for considering my view.	
12/09/2024	Of the options under study, the 5th Avenue South diagonal seems best; the board preferred option with split CID stations is the worst. The network needs good connectivity. Please study no second tunnel with the east, south, and west lines in the existing DSTT and the Ballard line to/from Westlake only; I know it is out of scope. ST3 is in crisis; the crisis is deeper than that of Sound Move, when the Board reset was very significant. Has the ridership modeling been updated with the decline in office employment?	Jack Whisner
12/11/2024	Dear Sir/Madam: I suspect that federal assistance will most likely be far and few over the next four years so time will be on STs side. And I know I'm a few days late but here is an important suggestion regarding the 4th Ave Shallow Alternative option which is: Reach an agreement with BNSF to move their track and tunnel entry over 20-30 yards, this would allow ST to move the 4th Ave CID station north of Jackson St. This seems like it would eliminate some of the headaches associated with BNSF, 5th Ave residents and deep tunneling options. I hope this helps and is something ST would look into. Having a conveniently located station would be a tremendous asset for the city. All the best, Larry Scheib	Larry Scheib

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Appendix A

NEPA Scoping Public Involvement Summary

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Ballard Link Extension

NEPA Scoping
Public Involvement Summary

December 2024

SoundTransit

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NEPA Scoping Public Involvement Summary

NEPA SCOPING PERIOD: Oct. 24 – Dec. 9, 2024

PROJECT PHASE: PLANNING

Introduction

In partnership with the Federal Transit Administration, Sound Transit will publish a new National Environmental Policy Act (NEPA) and Supplemental State Environmental Policy Act (SEPA) Draft Environmental Impact Statement (EIS) for the Ballard Link Extension. This second environmental review process will build upon the 2022 West Seattle and Ballard Link Extensions (WSBLE) Draft EIS with analysis of new alternatives and project refinements identified by the Sound Transit Board in March and July of 2023. Given the additional environmental review needed for these project refinements, staff determined that the WSLE and BLE projects would advance on two different environmental review timelines. Sound Transit has been collecting feedback from Tribes, the public, and agencies to inform the study of the Ballard Link Extension (BLE) alternatives since 2017, with the first scoping phase for the WSBLE Draft EIS being carried out in 2019.

The first stage in this second EIS process is a scoping period, however Sound Transit is not starting over. All comments from the previous environmental review process (scoping, draft EIS, etc.) have been used to inform the current project status and will be carried forward into the new BLE Draft EIS.

Overview

Sound Transit conducted NEPA scoping for the Ballard Link Extension (BLE) project from Oct. 24 through Dec. 9, 2024. This second NEPA scoping phase provided an opportunity for partners and the community to learn about and comment on the project as it stands after six years of analysis, design and public engagement.

This report describes Sound Transit's public involvement efforts during NEPA scoping, which included in-person and online opportunities to review and provide input on the following:

- Current route and station alternatives.
- Topics to study in the Environmental Impact Statement (EIS).
- Project Purpose and Need.

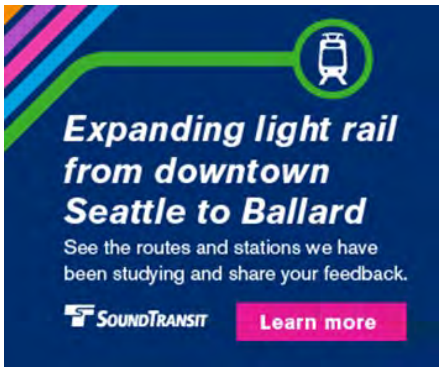
Participation by the numbers

166 Scoping comments
9,600+ Online visitors to our online open house
2 Public scoping meetings with 179 attendees
Earned media from 4 publications
6 Email updates engaging 12,200+ subscribers and a blog post engaging 4,300+ subscribers
Ads featured in 5 digital publications
Posts on Facebook with 24 engagements
Informational materials translated into 4 languages

Notifications

Sound Transit advertised the NEPA scoping comment period using various notification tools between October and December 2024. Notifications included the following and details are available in the appendix.

- Emails to subscriber lists.
- Social media (Facebook).
- Media advisory.
- Digital ads in local publications.
- Notice in the Federal Register.


Expanding light rail from downtown Seattle to Ballard
See the routes and stations we have been studying and share your feedback.
SOUNDTRANSIT
Learn more

Digital ad example

Outreach opportunities: In-person and online

Public meetings:

Sound Transit held two in-person NEPA scoping meetings for two hours each. The meetings included displays with project information, display boards showing current station and route alternatives, and opportunities to submit scoping comments. Paper comment forms and laptops were available for attendees to use and submit their scoping comments. A court reporter was also in attendance to transcribe scoping comments from attendees (court reporters and interpreters worked together to provide in-language transcription of verbal comments).

Scoping meetings were held in ADA-accessible venues that were transit accessible.

Scoping Meeting #1 (99 attendees)

Thursday, Nov. 7, 2024: 5-7 p.m.
Union Station, 401 S Jackson St, Seattle, WA 98104
Interpretation was available in Mandarin, Cantonese, Vietnamese, and ASL.

Scoping Meeting #2 (80 attendees)

Wednesday, Nov. 13: 5-7 p.m.
National Nordic Museum, 2655 NW Market St, Seattle, WA 98107
Interpretation was available in ASL.

How to provide scoping comments
Comment online: soundtransit.org/ballardlink-design
Email us: blescoping@soundtransit.org
Leave a voicemail: 206-903-7223
Mail us: Ballard Link Extension, c/o Lauren Swift, Sound Transit, 401 S. Jackson St., Seattle, WA 98104

ASL Interpretation at Union Station scoping meeting

Online open house:

An online open house was available for approximately six weeks between Oct. 24 – Dec. 9, 2024. The online open house provided stakeholders the opportunity to review scoping information and provide scoping comments on current route and station alternatives, topics to study in the Draft EIS, and the project Purpose and Need. All materials from in-person events were available on the online open house. The online open house was fully translated into four languages: Traditional and Simplified Chinese, Vietnamese, and Spanish. Additional language translations were available by request and through an embedded Google Translate tool on the site.

The online open house received over 9,600 visitors during the NEPA scoping period.

Materials:

The following materials were developed or made available for the in-person and online open houses. All materials (except where noted) were translated into four languages: Traditional and Simplified Chinese, Vietnamese, and Spanish.

NEPA scoping information handout: A two-page document providing an overview of the environmental review process thus far, the scoping period, a project timeline, and next steps, and highlighting the ways to submit a scoping comment.

Purpose and Need handout: A one-page handout outlining the project Purpose and Need statement (available in English; translated versions of the Purpose and Need statement were available on the online open house).

Presentation: The presentation included a project overview and timeline, information on the planning phase (2017-2023) and the need for a second NEPA scoping period, a map of the current route and station alternatives, an overview of the environmental review process, and information on ways to provide scoping comments.

Display boards: The display boards shared general information about the project and the upcoming environmental review process, including a project timeline, information about NEPA scoping and why it is happening again, how to comment during the scoping period, and maps of the current station and route alternatives by project segment.

Meeting guide: A handout for each meeting attendee that included the presentation slides and meeting display boards.

Project fact sheet: A general project fact sheet highlighting the project map, timeline, and key milestones.

Comment form: A one-page comment form providing space to write comments and a place sign up for BLE email updates.

Appendix M from the West Seattle and Ballard Link Extension Projects Draft EIS: An appendix from the project's previous Draft EIS with information about prior alternatives development processes, which informed current station and alignment alternatives (available in English upon request).

Further Studies Executive Summary: A summary of the further studies that followed the previous Draft EIS; study results that informed the refinement to current alternatives were highlighted. (available in English upon request).

Comment collection

Sound Transit collected NEPA scoping comments in a variety of ways, both in-person and online:

Online open house: Commenters could provide scoping comments online using the project website, available 24/7 during the scoping period.

Comment cards: Commenters could write their feedback on comment cards available at in-person open houses events held during the scoping period.

Speak with a court reporter: Commenters could share a verbal comment with a court reporter at an open house, which would then be transcribed.

Voicemail: Commenters could call the Ballard Link Extension project phone number to record a verbal comment, which would be transcribed.

Email: Commenters could email their scoping comments to blescoping@soundtransit.org

Mailed letter: Commenters could mail letters with their comments to Sound Transit.

Comments received

Nearly 170 scoping comments were received through various channels including comment forms and comments made at in-person events, the online open house, emails, and voicemails.

Overall Scoping Feedback:

- Support for regional transit and for building the BLE as quickly as possible and fulfilling the voter approved ST3 plan.
- Support for building the project right to effectively serve Seattle for generations.
- Support for tunnel alignments where possible.
- Interest in providing effective multimodal access at stations and prioritizing below ground station transfers.
- Concerns related to property acquisitions and construction effects on homes and businesses.
- Interest in an extended 90-day public comment period when the Draft EIS is released.

CID/SODO Segment Scoping Feedback:

- Interest in locating the CID Station on 4th Avenue S to create a transit hub in South Downtown and prioritizing an efficient passenger transfer experience.
- Some interest in locating the CID Station at S Dearborn Street.
- Some concerns that the CID Station at S Dearborn Street is not accessible to existing infrastructure, and that it could affect or displace the nearby artist community.
- Interest in removing the CID Station alternatives at 5th Avenue from consideration.
- Some interest in continued study of the social and economic impacts of CID Station alternatives on nearby communities.
- Concerns about displacement and neighborhood effects to the CID community and small businesses during construction.

Downtown Segment Scoping Feedback:

- Concerns about construction impacts, particularly road closures and construction of multiple stations concurrently, and noise and vibration.
- Some interest in preserving the building housing the Washington State Department of Corrections reentry center and not displacing the program.
- Some support for the Midtown Station location on 5th Ave.

South Interbay and Interbay/Ballard Segments Scoping Feedback:

- Some interest in the preferred Smith Cove station location for its proximity to the cruise ship

terminals.

- Some interest in a tunnel alignment along Elliott Avenue.
- Some concern about business displacements in Interbay.
- Interest in a tunnel under Salmon Bay instead of a bridge.
- Support for a Ballard station located at 15th Avenue NW.
- Some interest in a station farther west or exploring pedestrian tunnels to better connect the Ballard station to the Ballard core.

Community members providing scoping comments at the NEPA Scoping Meeting at Union Station

Next steps

Additional opportunities for public involvement related to the project design will occur throughout the project planning phase and following the release of the Draft EIS, expected in 2025. There are multiple ways for the public to stay informed about the project:

Email the project: ballardlink@soundtransit.org.

Call the Community Outreach Team: 206-903-7223.

Visit the project website: soundtransit.org/ballardlink-design.

Sign up for project updates by email: soundtransit.org/subscribe.

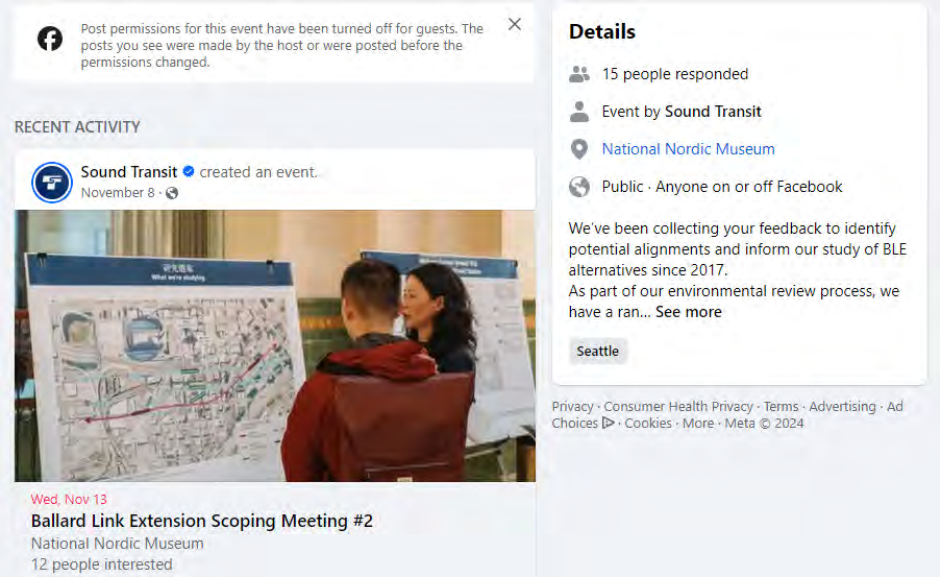
Appendix A: Notifications

Sound Transit advertised the scoping comment period between October and December 2024:

Social media

Sound Transit notified the community about in-person and online opportunities to participate in the scoping comment period through Facebook. An organic post was made to announce the start of the scoping period and share information on how to submit a comment. Following this announcement, two events were created for the Nov. 7 and Nov. 13 scoping meetings and advertised organically on the Sound Transit page.

Sound Transit Facebook event Post

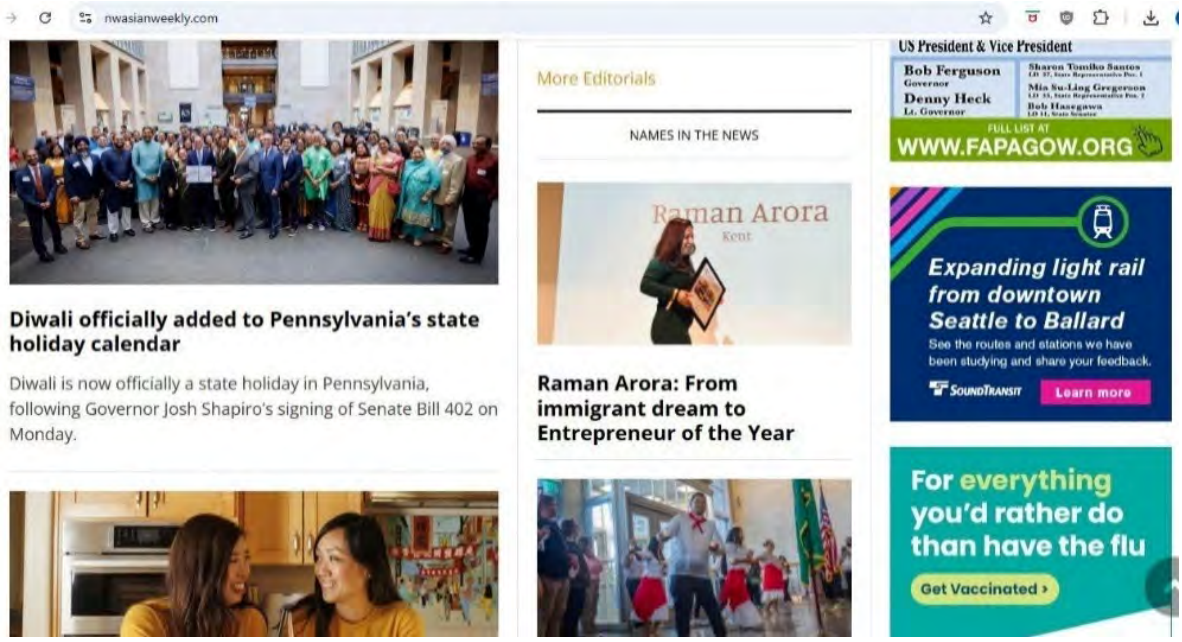

Post permissions for this event have been turned off for guests. The posts you see were made by the host or were posted before the permissions changed.
RECENT ACTIVITY
Sound Transit created an event.
November 8 ·
Wed, Nov 13
Ballard Link Extension Scoping Meeting #2
National Nordic Museum
12 people interested
Details
15 people responded
Event by Sound Transit
National Nordic Museum
Public · Anyone on or off Facebook
We've been collecting your feedback to identify potential alignments and inform our study of BLE alternatives since 2017.
As part of our environmental review process, we have a ran... See more
Seattle
Privacy · Consumer Health Privacy · Terms · Advertising · Ad Choices · Cookies · More · Meta © 2024

Digital ads

The project team ran digital ads to five local publications (including two in-language Chinese publications) to advertise the scoping meetings. Ads linked to the project online open house with more information on how to make a public comment.

Publication	Run Dates	Impressions
International Examiner	10/24 - 11/7	33,130
NW Asian Weekly	10/24 - 11/7	17,948
Seattle Chinese Post	10/24 - 11/7	8,730
Seattle Chinese Times	10/24 - 11/7	6,400
The Seattle Times	10/24 - 11/7	73,370

Digital ad example


nwasianweekly.com
More Editorials
NAMES IN THE NEWS
Diwali officially added to Pennsylvania's state holiday calendar
Diwali is now officially a state holiday in Pennsylvania, following Governor Josh Shapiro's signing of Senate Bill 402 on Monday.
Raman Arora
Kent
Raman Arora: From immigrant dream to Entrepreneur of the Year
US President & Vice President
Bob Ferguson
Governor
Denny Heck
Lt. Governor
FULL LIST AT
WWW.FAPAGOW.ORG
Expanding light rail from downtown Seattle to Ballard
See the routes and stations we have been studying and share your feedback.
SOUNDTRANSIT
Learn more
For everything you'd rather do than have the flu
Get Vaccinated ›

In-language digital ad example

Media Advisory

Sound Transit posted a media advisory on the Ballard Link Extension project page on ST.org.

Home / Get to know us / News and events / Project updates / Public comment period begins on Ballard Link Extension

Ballard Link Extension

Public comment period begins on Ballard Link Extension

Opportunity for public to provide feedback on the project; comment period ends Dec. 9

October 28, 2024

Sound Transit has started the National Environmental Policy Act (NEPA) scoping process for the **Ballard Link Extension.** The extension will add 7.7 miles of light rail service with nine new stations from downtown Seattle to the Ballard neighborhood, including a new downtown Seattle rail-only tunnel.

Sound Transit previously conducted a scoping process and comment period in 2019 to inform the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS) that was published in 2022. Since then, the West Seattle and Ballard Link projects have separated, and Sound Transit is now developing a new NEPA Draft EIS and Supplemental State Environmental Policy Act (SEPA) Draft EIS for the Ballard Link Extension.

The new Ballard Link Extension Draft EIS will carry forward the range of alternatives and all public feedback collected from the project's earlier combined WSBLE Scoping and Draft EIS comment periods.

Community members can learn more about the project and provide additional new feedback through the **Ballard Link Extension participate online site and** at two public scoping meetings:

- **Thursday, Nov. 7, 5 – 7 p.m.; short presentation at 5:30 p.m.**
  - Union Station, Joni Earl Great Hall
  - 401 S Jackson Street, Seattle, WA 98104
  - Cantonese, Mandarin, and Vietnamese interpretation and translated materials will be available. ASL interpretation will be provided.
  - Refreshments and activities for children will be provided.
- **Wednesday, Nov. 13, 5 – 7 p.m., short presentation at 5:30 p.m.**
  - National Nordic Museum
  - 2655 NW Market Street, Seattle, WA 98107
  - ASL interpretation will be provided.
  - Refreshments and activities for children will be provided.

Feedback can also be emailed to **ballardlink@soundtransit.org** or called in at 206-903-7223.

Written comments can be mailed to:

- Ballard Link Extension, c/o Lauren Swift
  Sound Transit
  401 S. Jackson St., Seattle, WA 98104.

Comments are due December 9.

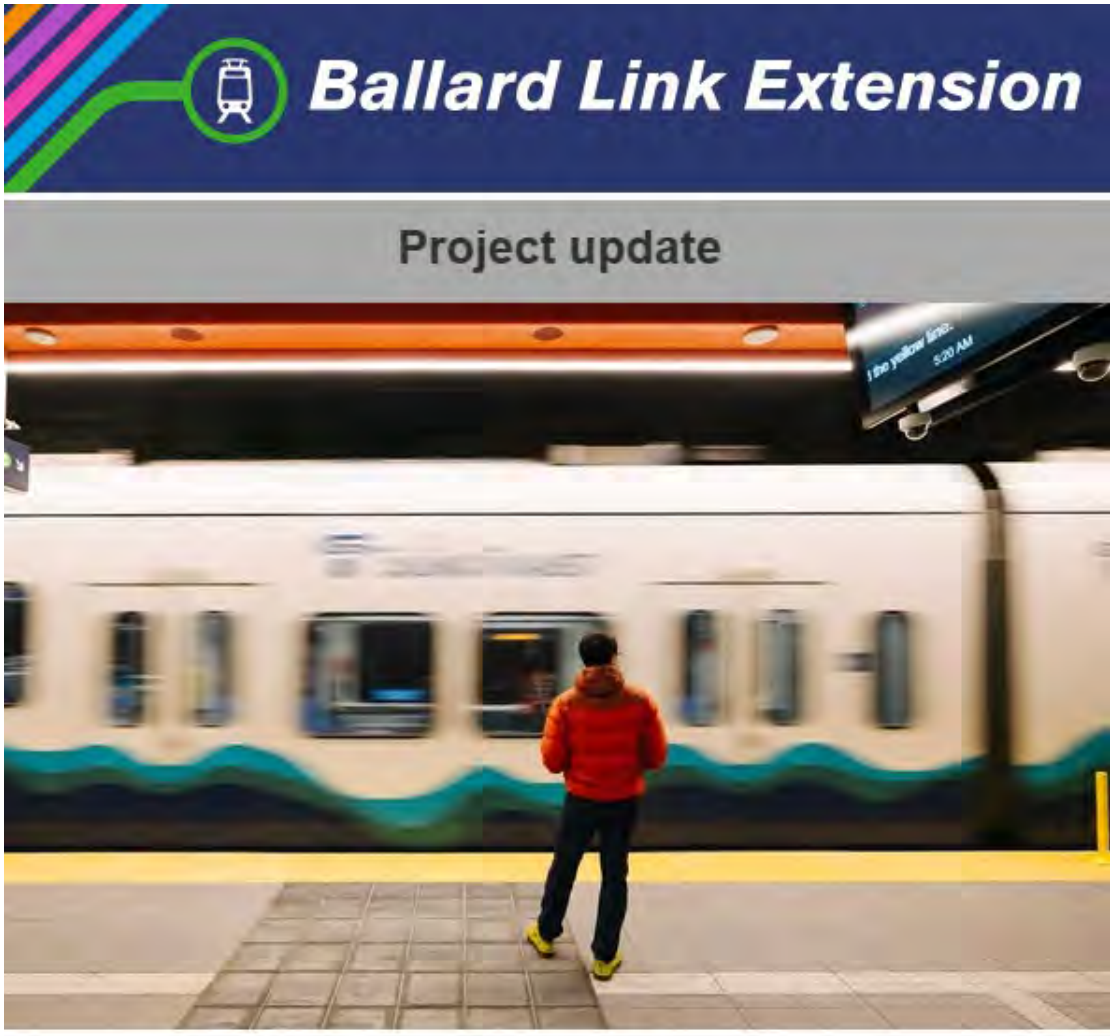
Following the NEPA scoping process, Sound Transit will prepare the Ballard Link Extension Draft EIS in coordination with the Federal Transit Administration. Publication of the Draft EIS is expected in 2025. Start of service for the Ballard Link Extension is scheduled for 2039.

More information is available about the Ballard Link Extension can be accessed here.

Email subscriber list

Sound Transit sent four emails to the project email subscriber list (over 12,200 subscribers) in preparation for the scoping period. The initial email announced the scoping period and in-person events and opportunities to provide comments. Subsequent emails provided updates to the scoping timeline and in-person meeting information.

One of the the four emails sent to email subscribers



BLE scoping begins today!

The National Environmental Policy Act (NEPA) scoping comment period for the Ballard Link Extension (BLE) begins today! This extended comment period will last 45 days, ending on Dec. 9. We are collecting your feedback on the project's Purpose and Need, route and station alternatives, and potential topics for study in the BLE Draft Environmental Impact Statement (EIS). We have collected public input on the project since planning began in 2017, and all your past comments will carry forward in the ongoing environmental review process. We invite you to share new and additional feedback with us.

Learn more at upcoming scoping meetings:

Drop by these open house scoping meetings at any time. Project staff will attend to answer questions and court reporters will be present to capture scoping comments. The scoping meeting content will cover information about the EIS process, project history, and current route and station alternatives.

Scoping Meeting #1

- Nov. 7, 5-7 p.m., short presentation at 5:30 p.m.
  - Union Station, 401 S Jackson Street, Seattle, WA 98104
  - *Cantonese, Mandarin, and Vietnamese interpretation and translated materials will be available. ASL interpretation will be provided.*
  - *Refreshments and activities for children will be provided.*

Scoping Meeting #2

- Nov. 13, 5-7 p.m., short presentation at 5:30 p.m.
  - National Nordic Museum, 2655 NW Market Street, Seattle, WA 98107
  - *ASL interpretation will be provided.*
  - *Refreshments and activities for children will be provided.*

To request accommodation, contact project staff in advance of a scoping meeting at ballardlink@soundtransit.org.

How to provide public comment:

- **Attend one of our scoping meetings:** We will have court reporters and computers available for submission of in-person and online comments.
- **Comment online:** soundtransit.org/ballardlink-design
- **Email us:** blescoping@soundtransit.org
- **Leave a voicemail:** 206-903-7223
- **Mail us:** Ballard Link Extension, c/o Lauren Swift, Sound Transit, 401 S. Jackson St., Seattle, WA 98104

Review and comment now

Stay up to date

- 2024年10月24日，Sound Transit開始進行Ballard Link擴展項目 (Ballard Link Extension, BLE) 的《國家環境政策法》(NEPA) 選址程序。我們正在徵求對於BLE《環境影響報告草案》(Draft Environmental Impact Statement, Draft EIS) 中的目的與需求、備選方案及潛在影響的意見回饋。45天的選址意見徵詢期將於12月9日結束。 隨時掌握Ballard Link擴展項目的最新資訊。
- 2024年10月24日，Sound Transit开始了Ballard Link扩展项目 (BLE) 的《国家环境政策法》(NEPA) 范围界定流程。我们正在寻求有关Ballard Link扩展项目 (Ballard Link Extension, BLE) 《环境影响报告书 (EIS) 草案》中所研究的目的和需求、备选方案以及潜在影响的反馈。为期45天的范围界定评议期将于12月9日结束。获取有关Ballard Link扩展项目的最新消息。
- Vào ngày 24 tháng 10 năm 2024, Sound Transit đã bắt đầu quy trình xác định phạm vi theo Đạo Luật Chính Sách Môi Trường Quốc Gia (National Environmental Policy Act, NEPA) cho dự án Mở Rộng Tuyến Ballard Link (Ballard Link Extension, BLE). Chúng tôi đang thu thập ý kiến phản hồi về Mục Đích và Nhu Cầu, các lựa chọn thay thế và các tác động tiềm ẩn để đưa vào nghiên cứu trong Bản Thảo Báo Cáo Tác Động Môi Trường (EIS) cho dự án BLE. Giai đoạn đóng góp ý kiến về xác định phạm vi sẽ kéo dài 45 ngày và kết thúc vào ngày 9 tháng 12. Luôn cập nhật thông tin về dự án Mở Rộng Tuyến Ballard Link.
- El 24 de octubre de 2024, Sound Transit inició el proceso de definición del alcance de la Ley de Política Ambiental Nacional (National Environmental Policy Act, NEPA) para la extensión de Link a Ballard (Ballard Link Extension, BLE). Queremos recibir comentarios sobre el propósito y la necesidad, las alternativas y los posibles impactos que se estudiarán en el borrador de la Declaración de Impacto Ambiental (Draft Environmental Impact Statement, EIS) de la BLE. El 9 de diciembre finaliza el plazo de 45 días para enviar comentarios. Manténgase al tanto del proyecto de Extensión de Ballard Link.
- On Oct. 24, 2024, Sound Transit began the National Environmental Policy Act scoping process for the Ballard Link Extension (BLE). We are seeking feedback on the Purpose and Need, alternatives, and potential topics to be studied in the BLE Draft Environmental Impact Statement. The 45-day scoping comment period ends on Dec. 9. Stay current with the Ballard Link Extension project.

More project info: soundtransit.org/ballardlink
Get in touch: ballardlink@soundtransit.org or 206-903-7229

Notice in Federal Register

The Federal Register is the official daily publication for rules, proposed rules, and notices of Federal agencies and organizations. Sound Transit alongside the Federal Transit Administration issued a Notice of Intent to Prepare an Environmental Impact Statement (EIS) on the Federal Register on Oct. 24, 2024. This notice contained project information like the Purpose and Need and description of proposed alternatives, background on the previously associated WSBLE environmental review process, notice of the 45-day NEPA scoping comment period, and contact information for the Sound Transit Environmental Team.

This document is scheduled to be published in the
Federal Register on 10/24/2024 and available online at
https://federalregister.gov/d/2024-24585, and on **https://govinfo.gov**

DE 4910-57-P

DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

Notice of Intent to Prepare an Environmental Impact Statement for the Ballard Link Extension Project, King County, Washington

AGENCY: Federal Transit Administration (FTA), Department of Transportation (DOT).

ACTION: Notice of intent to prepare an environmental impact statement (EIS).

SUMMARY: The Federal Transit Administration (FTA), as lead Federal agency, and the Central Puget Sound Regional Transit Authority (Sound Transit), as local project sponsor and joint lead agency, issue this notice to advise the public that they intend to prepare an environmental impact statement (EIS) pursuant to the National Environmental Policy Act (NEPA) for the Ballard Link Extension Project (Project) located in the City of Seattle, King County, Washington.

DATES: Comments related to the NEPA review of this project must be received on or before [INSERT DATE 45 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER]. FTA will consider comments received after that date to the extent practicable. FTA will consider all comments received during this NEPA scoping period and those previously submitted during the Washington State Environmental Policy Act (SEPA) scoping process. Commenters who previously provided SEPA scoping comments do not need to resubmit those same comments for consideration under NEPA, but may elect to do so.

ADDRESSES: Comments on the scope of the EIS should be directed to: Lauren Swift, Central Corridor Environmental Manager, 401 South Jackson Street, Seattle, WA, 98104, by email to: lauren.swift@soundtransit.org, or by phone at 206-398-5301.

FOR FURTHER INFORMATION CONTACT: For FTA: Erin Littauer, erin.littauer@dot.gov, 206-220-7521. For Sound Transit: Lauren Swift, lauren.swift@soundtransit.org, 206-398-5301.

SUPPLEMENTARY INFORMATION: The Project would extend existing light rail service along a 7.7-mile corridor through downtown Seattle, from SODO to Ballard, and include a new 3.3-mile light rail-only tunnel from south of the Chinatown-International District to South Lake Union and Seattle Center/Uptown. Stations would serve the following areas: Chinatown-International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard. FTA has created the following "Unique Identification Number" that will be included on all environmental documents for this project: EISX-021-36-R10-1728553542.

FTA, as NEPA Federal lead agency, and Sound Transit, as joint lead agency for NEPA and lead agency under the Washington State Environmental Policy Act (SEPA), issued a Notice of Intent / Scoping Notice in February 2019 and later published a combined NEPA/SEPA Draft EIS in January 2022 that evaluated both the West Seattle Link Extension and the Ballard Link Extension together as a single project: the West Seattle and Ballard Link Extensions Project (WSBLE). The extensions were evaluated together in the WSBLE Draft EIS because of their location, schedule, and review efficiencies for partner agencies.

In July 2022, the Sound Transit Board directed Sound Transit staff to prepare further studies evaluating additional station options and other refinements for the Ballard Link Extension (BLE). Some of these project options and refinements required additional conceptual engineering and environmental review. Rather than delay completion of the environmental review process for the West Seattle Link Extension while additional review was conducted for BLE, Sound Transit and FTA decided to move forward under separate environmental reviews for each extension. As described in the WSBLE Draft EIS, the two extensions will operate as separate lines, and the extensions are stand-alone projects with independent utility.

Because the environmental review processes are now separated for the two extensions, Sound Transit is preparing a SEPA Supplemental Draft EIS that evaluates the new station options and refinements for the BLE. FTA has determined that a new NEPA Draft EIS be prepared for the BLE, because it is now being evaluated independently from the West Seattle extension. The NEPA process requires that project scoping be repeated with a 30-day public comment period. Scoping for BLE has been extended with a 45-day public comment period. The scoping process and Draft EIS for the BLE will build on the analysis completed for the WSBLE Draft EIS.

Comments made during the previous scoping process (February 19 through April 2, 2019) will be carried forward and considered, as will all of the relevant analysis of alternatives and environmental impacts included in the 2022 Draft EIS. At the conclusion of the NEPA scoping process, FTA and Sound Transit anticipate issuing the Draft NEPA EIS and SEPA Supplemental Draft EIS, including the new information and analysis.

FTA has determined that the project will not be evaluated as a major project as defined in 23 U.S.C. 139(a)(7).

I. Purpose and Need for the Project

The purpose of the project is to expand the Sound Transit Link light rail system from SODO to Ballard, to make appropriate community investments to improve mobility, and to increase capacity and connectivity for regional connections in order to achieve the following:

- Provide rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the regional transit system plan, Sound Transit 3 Plan (https://www.soundtransit.org/get-to-know-us/documents-reports/sound-transit-3).
- Improve regional mobility by increasing connectivity and capacity through Downtown Seattle to meet the projected transit demand.

- Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's *Regional Transit Long-Range Plan* (https://www.soundtransit.org/sites/default/files/documents/2015123_lrpupdate.pdf).
- Implement a system that is technically and financially feasible to build, operate, and maintain.
- Expand mobility for the corridor and the region's residents, which include transit-dependent residents, low-income people, and communities of color.
- Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development and multi-modal integration in a manner that is consistent with local land use plans and policies, including Sound Transit's Equitable Transit-Oriented Development Policy (https://www.soundtransit.org/system-expansion/creating-vibrant-stations/transit-oriented-development) and Sustainability Plan (https://www.soundtransit.org/get-to-know-us/documents-reports/2019-sustainability-plan).
- Encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections, consistent with Sound Transit's *System Access Policy* (https://www.soundtransit.org/system-expansion/creating-vibrant-stations/connecting-to-stations).
- Preserve and promote a healthy environment and economy by minimizing adverse impacts on the natural, built, and social environments through sustainable practices.

The need for the project is as follows:

- When measured using national standards, existing transit routes between SODO and Ballard currently operate with poor reliability. Roadway congestion in the project corridor will continue to degrade transit performance and reliability as the city is expected to add approximately 287,000 people and approximately 214,000 jobs between 2018 and 2050 (Puget Sound Regional Council 2023).

- Increased ridership from regional population and employment growth will increase operational frequency in the existing Downtown Seattle Transit Tunnel, requiring additional tunnel capacity.
- Puget Sound Regional Council (the regional metropolitan planning organization) and local plans call for high-capacity transit in the corridor consistent with VISION 2050 (https://www.psrc.org/planning-2050/vision-2050) and the Regional Transit Long-Range Plan (https://www.soundtransit.org/sites/default/files/documents/2015123_lrpupdate.pdf).
- The region's residents and communities, including transit-dependent people, low-income people, and communities of color, need long-term regional mobility and multi-modal connectivity as called for in the Washington State Growth Management Act (Revised Code of Washington 36.70A.108).
- Regional and local plans call for increased residential and/or employment density at and around high-capacity transit stations, and increased options for multi-modal access. VISION 2050 has a goal for 65 percent of the region's population and 75 percent of the region's employment to occur in regional growth centers and within walking distance of transit.
- Environmental and sustainability goals of the State and region, as established in Washington State law and embodied in Puget Sound Regional Council's VISION 2050 (2020) and 2022-2050 Regional Transportation Plan (2022), include reducing greenhouse gas emissions by prioritizing transportation investments that decrease vehicle miles traveled.

II. Description of Proposed Action and Alternatives

Each light rail extension build alternative is approximately 7.7 miles long and includes up to nine stations that serve the following areas: Chinatown-International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard. FTA and Sound Transit may also examine several design options and potential minimal operable segments for the proposed alternatives. Information about the proposed project, the alternatives development process, scoping, and the EIS process are available on the project website:

https://www.soundtransit.org/system-expansion/ballard-link-extension, by contacting the project sponsor at ballardlink@soundtransit.org, or the project phone line at (206) 903-7223. For purposes of this notice, the proposed build alternatives can be generally described as follows:

A new downtown tunnel would begin in the vicinity of the Stadium station in SODO, head north with alignments between 4th Avenue S and 6th Avenue S through the Chinatown-International District, then travel northwest below 4th Avenue, 5th Avenue or 6th Avenue through Midtown and Westlake. The alternatives would continue in a tunnel configuration along Westlake Avenue N to South Lake Union with a station near Denny Way before turning northwest with a station near Aurora Avenue N between Harrison and Roy streets. The alternatives would continue in a tunnel towards Seattle Center with a station on either Republican or Mercer Streets. The alternatives then turn north and begin to transition to elevated or retained cut configurations to serve a Smith Cove station along Elliott Avenue W. From the Smith Cove station, the alternatives either continue in an elevated configuration along 15th Avenue W or transition to a retained cut along the east side of the Burlington Northern Santa Fe (BNSF) railway tracks to an elevated or retained cut station in Interbay near W Dravus Street. From the Interbay station, alternatives transition to the east of 15th Avenue W and cross Salmon Bay in a tunnel or on a high-level fixed bridge. One alternative would continue in an elevated alignment along 15th Avenue W and cross Salmon Bay on the west side of 15th Avenue W on a movable bridge. Station options in Ballard include elevated and tunnel stations near NW Market Street on 15th Avenue NW or 14th Avenue NW.

The build alternatives could also include transit-related roadway, bicycle, maritime, and pedestrian projects by Sound Transit or others. These improvements may be eligible for Federal funding and could be part of the transit project or constructed together with it as part of a joint effort with agency partners, thereby meriting joint environmental analysis. This could include access improvements around station areas and over waterway crossings. Sound Transit would

identify these improvements and could include them as part of the project as it works with partner agencies.

III. Summary of Expected Impacts

Consistent with NEPA, FTA and Sound Transit will evaluate, with input from the public, Tribes, and agencies, the potential impacts of the alternatives on the natural, built, and social environments. Likely areas of investigation include, transportation (including navigable waterways), land use and consistency with applicable plans, land acquisition and displacements, socioeconomics, park and recreation resources, historic and cultural resources, environmental justice, visual and aesthetic qualities, air quality, noise and vibration, energy use, safety and security, and ecosystems, including threatened and endangered species and marine mammals. The EIS will evaluate short-term construction impacts and long-term operational impacts. It will also consider indirect and cumulative impacts. The EIS will also propose measures to avoid, minimize, or mitigate significant adverse impacts.

FTA and Sound Transit will comply with all Federal environmental laws, regulations, and executive orders applicable to the proposed project during the environmental review process.

IV. Anticipated Federal Permits and Other Authorizations

Federal Transit Administration:
NEPA Final Environmental Impact Statement and Record of Decision
National Historic Preservation Act Section 106 Review
United States Department of Transportation Act of 1966, Section 4(f)
Land and Water Conservation Fund Act of 1965, Section 6(f) (if needed)

Federal Emergency Management Agency:
Conditional Letter of Map Revision (if needed)
Letter of Map Revision (if needed)

United States Army Corps of Engineers:
Clean Water Act, Section 404 (if needed) (including WA Department of Ecology Water Quality Certification: Clean Water Act Section 401)
Rivers and Harbors Act, Section 10 (if needed)
United States Code Title 33 Section 408 Review (if needed)

United States Coast Guard:

United States Coast Guard Bridge Permit (if needed)

United States Fish and Wildlife Service:
Federal Endangered Species Review

National Oceanic and Atmospheric Administration Fisheries Service:
Federal Endangered Species Review
Essential Fish Habitat Review
Marine Mammal Take Incidental Harassment Authorization (if needed)

United States Department of the Interior:
National Historic Preservation Act Section 106 Review
United States Department of Transportation Act of 1966, Section 4(f)

V. Schedule for the Decision-Making Process

Below is a tentative schedule for the decision-making process, including environmental review milestones:

Draft EIS publication: April 2025
Confirmation or modification of the Preferred Alternative: July 2025
Final EIS publication: May 2026
Record of Decision: October 2026

As noted in the tentative schedule, the Agencies intend to complete the EIS for the Project within two years, measured from the date of the publication of this notice to the date the record of decision (ROD) is signed. The Agencies will accept public comments on the scope of the EIS (*i.e.*, the information presented in this notice and at https://www.soundtransit.org/system-expansion/ballard-link-extension) until [INSERT DATE 45 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER]. The Agencies will then consider those comments as they prepare the Draft EIS. The Agencies will announce the availability of the Draft EIS in the *Federal Register* and via local media outlets. Sound Transit expects the Draft EIS will be available for a minimum of 45 days for the public comment period in Spring 2025. The Draft EIS will be distributed and available for public and agency review and comment prior to a public hearing. The Agencies will consider substantive comments timely submitted during the public comment period and comments previously submitted for WSBLE and then anticipate preparing a Final EIS in Spring 2026 and ROD in Fall 2026. The Final EIS will identify a

preferred alternative and any necessary mitigation commitments. The Agencies expect that all Federal environmental authorization decisions for the construction of the Project will be completed within a reasonable period following issuance of the ROD.

Notices of public meetings, including hearings, have been, and will continue to be, given through a variety of media providing the time and place of the meeting along with other relevant information. Meeting date, time, and location information can be found on the Project website at https://www.soundtransit.org/system-expansion/ballard-link-extension.

Public meeting locations will comply with the Americans with Disabilities Act. People requesting special accommodations should contact Sound Transit via email at ballardlink@soundtransit.org.

Susan K. Fletcher,

Regional Administrator,

FTA Region 10.

[FR Doc. 2024-24585 Filed: 10/23/2024 8:45 am; Publication Date: 10/24/2024]

Appendix B: Materials

Scoping information handout (2 pages)

Purpose and Need (2 pages)

Presentation (13 pages)

Display boards (13 pages)

Open house meeting guides – See Presentation and Display Boards

Project fact sheet (2 pages)

Scoping comment form (2 pages)

Scoping information handout

Ballard Link Extension

NEPA Scoping Information

Sound Transit has been collecting feedback to identify potential alignments and inform our study of Ballard Link Extension (BLE) alternatives since 2017. Sound Transit is now developing a new National Environmental Policy Act (NEPA) Draft Environmental Impact Statement (EIS) and Supplemental State Environmental Policy Act (SEPA) Draft EIS for the BLE. The NEPA EIS process includes a scoping comment period.

NEPA scoping comment period Oct. 24 – Dec. 9 2024

This scoping comment period is intended to collect feedback on the project Purpose and Need, project alternatives, and potential topics to be studied in the BLE Draft EIS. Based on public feedback, we are conducting an extended 45-day comment period.

You may have submitted comments during our previous comment period for NEPA/SEPA scoping in 2019 and/or in response to the West Seattle and Ballard Link Extensions (WSBLE) Draft EIS in 2022. We will carry forward public feedback and comments collected from the start of the project as part of the ongoing environmental review phase. We invite you to share additional and new feedback with us.

Visit our online open house to learn more about the BLE project, anticipated timeline, and route and station options (also known as alternatives)

soundtransit.org/ballardlink-design

How to comment

Online: soundtransit.org/ballardlink-design

Email: blescoping@soundtransit.org

Mail: Ballard Link Extension,
c/o Lauren Swift, Sound Transit,
401 S. Jackson St. Seattle, WA 98104

Phone: 206-903-7223

Attend a scoping meeting:

Scoping Meeting #1

Nov. 7, 5 – 7 p.m.

Union Station
401 S Jackson St.
Seattle, WA 98104

Cantonese, Mandarin, and Vietnamese interpretation and translated materials will be available. ASL interpretation will be provided. Refreshments and activities for children will be provided.

Scoping Meeting #2

Nov. 13, 5 – 7 p.m.

National Nordic Museum
2655 NW Market St.
Seattle, WA 98107

ASL interpretation will be provided. Refreshments and activities for children will be provided.

How did we get here?

2018-2019

Early scoping and scoping for the West Seattle and Ballard Link Extensions (WSBLE) projects.

2022

WSBLE Draft EIS publication and 90-day comment period.

March and July 2023

Following the Draft EIS comment period, the Sound Transit Board directed Further Studies of BLE alternatives which led to Board actions that added new alternatives and modified the preferred alternatives for BLE.

2025

Given additional environmental review needed for project refinements, Sound Transit will publish a new BLE NEPA Draft EIS/SEPA Supplemental Draft EIS, anticipated in 2025.

Project timeline and next steps

At the conclusion of the NEPA scoping process, Sound Transit will publish a new BLE NEPA Draft EIS/SEPA Supplemental Draft EIS in coordination with the Federal Transit Administration (FTA), with publication anticipated in 2025. There will be another comment period after the Draft EIS is published in which we will ask for feedback about the potential environmental impacts and benefits of each alternative as well as proposed actions that will help mitigate impacts.

After consideration of the Draft EIS and comments, including relevant comments from the 2022 West Seattle and Ballard Link Extensions Draft EIS, the Sound Transit Board will confirm or modify the previously identified preferred alternatives. FTA and Sound Transit will then publish a Final EIS, expected in 2026, that includes responses to the comments received on the Draft EIS. After the publication of the Final EIS, the Sound Transit Board is expected to select the project to built. FTA will then issue a Record of Decision for the project, concluding the environmental process and planning phase.

Questions?

Contact the Community Engagement team:
ballardlink@soundtransit.org or 206-903-7223.

Interpreter 800-823-9230
Español 漢語 한국어 日本語
Tagalog русский язык Tiếng Việt

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Scoping Purpose and Need

Ballard Link Extension

Project Purpose and Need

In an environmental process, the Purpose and Need statement establishes the basis for developing and evaluating a range of reasonable alternatives for environmental review and assists with the identification of a Preferred Alternative.

The purpose of the project is to expand the Sound Transit Link light rail system from SODO to Ballard, to make appropriate community investments to improve mobility, and to increase capacity and connectivity for regional connections to achieve the following:

- Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan (Sound Transit 2016).
- Improve regional mobility by increasing connectivity and capacity through Downtown Seattle to meet the projected transit demand.
- Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan (Sound Transit 2014a).
- Implement a system that is technically and financially feasible to build, operate, and maintain.
- Expand mobility for the corridor and the region's residents, which include transit-dependent residents, low-income people, and communities of color.
- Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development and multi-modal integration in a manner that is consistent with local land use plans and policies, including Sound Transit's Equitable Transit Oriented Development Policy (Sound Transit 2018) and Sustainability Plan (Sound Transit 2019).
- Encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections, consistent with Sound Transit's System Access Policy (Sound Transit 2013).
- Preserve and promote a healthy environment and economy by minimizing adverse impacts on the natural, built, and social environments through sustainable practices.

The project is needed because:

- When measured using national standards, existing transit routes between SODO and Ballard currently operate with poor reliability. Roadway congestion in the project corridor will continue to degrade transit performance and reliability as the city is expected to add about 287,000 people and about 214,000 jobs between 2018 and 2050 (Puget Sound Regional Council 2023).
- Increased ridership from regional population and employment growth will increase operational frequency in the existing Downtown Seattle Transit Tunnel, requiring additional tunnel capacity.
- Puget Sound Regional Council (the regional metropolitan planning organization) and local plans call for high-capacity transit in the corridor consistent with VISION 2050 (Puget Sound Regional Council 2020) and the Regional Transit Long-Range Plan (Sound Transit 2014a).
- The region's residents and communities, including transit-dependent people, low-income people, and communities of color, need long-term regional mobility and multi-modal connectivity as called for in the Washington State Growth Management Act (Revised Code of Washington 36.70A.108).
- Regional and local plans call for increased residential and/or employment density at and around high-capacity transit stations and increased options for multi-modal access. VISION 2050 has a goal for 65 percent of the region's population and 75 percent of the region's employment to occur in regional growth centers and within walking distance of transit.
- Environmental and sustainability goals of the state and region, as established in Washington state law and embodied in Puget Sound Regional Council's VISION 2050 (2020) and 2022-2050 Regional Transportation Plan (2022), include reducing greenhouse gas emissions by prioritizing transportation investments that decrease vehicle miles traveled.

Visit our online open house to learn more about the BLE project, anticipated timeline, and the route and station options (also known as alternatives) developed based on public and agency feedback since 2017. Traditional and Simplified Chinese, Vietnamese, and Spanish versions of the project Purpose and Need statement can be found on the project online open house as well.

soundtransit.org/ballardlink-design

Questions?

Contact the Community Engagement team:
ballardlink@soundtransit.org or 206-903-7223.

Interpreter 800-823-9230
Español 漢語 한국어 日本語
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Presentation

Ballard Link Extension

Scoping Meeting #1
11/7/2024

Agenda

- Project overview
- Environmental review process
- Next steps

Tonight's event

- **Learn:** *visit informational materials, ask staff questions*
- **Share:** *leave a scoping comment on:*
  - *Latest route and station alternatives*
  - *Topics to study in the Environmental Impact Statement*
  - *Project Purpose and Need*

Project Overview

Voter-approved system

Link light rail 1 2 3 4 T

- Five lines
- 116 miles
- 83 stations

Sounder trains N S

- Two lines
- 91 miles
- 14 stations

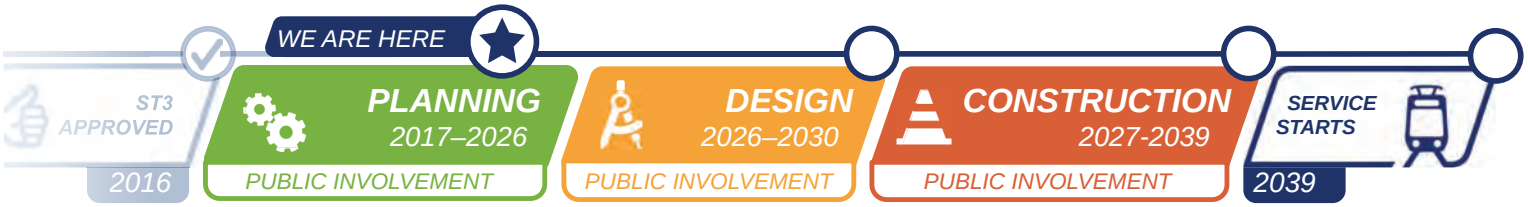
Stride bus rapid transit S1 S2 S3

- Three lines
- 45 miles on I-405 and SR 522
- Serving 12 cities and connecting to light rail in Shoreline, Lynnwood, Bellevue, and Tukwila

Ballard Link Extension

- ✔ Included in Sound Transit 3 (ST3) voter approved plan.
- ✔ Adds nearly eight miles of light rail service, including a new light rail-only downtown tunnel.
- ✔ Includes nine new stations from Chinatown-International District to Ballard.

Ballard Link Extension project timeline



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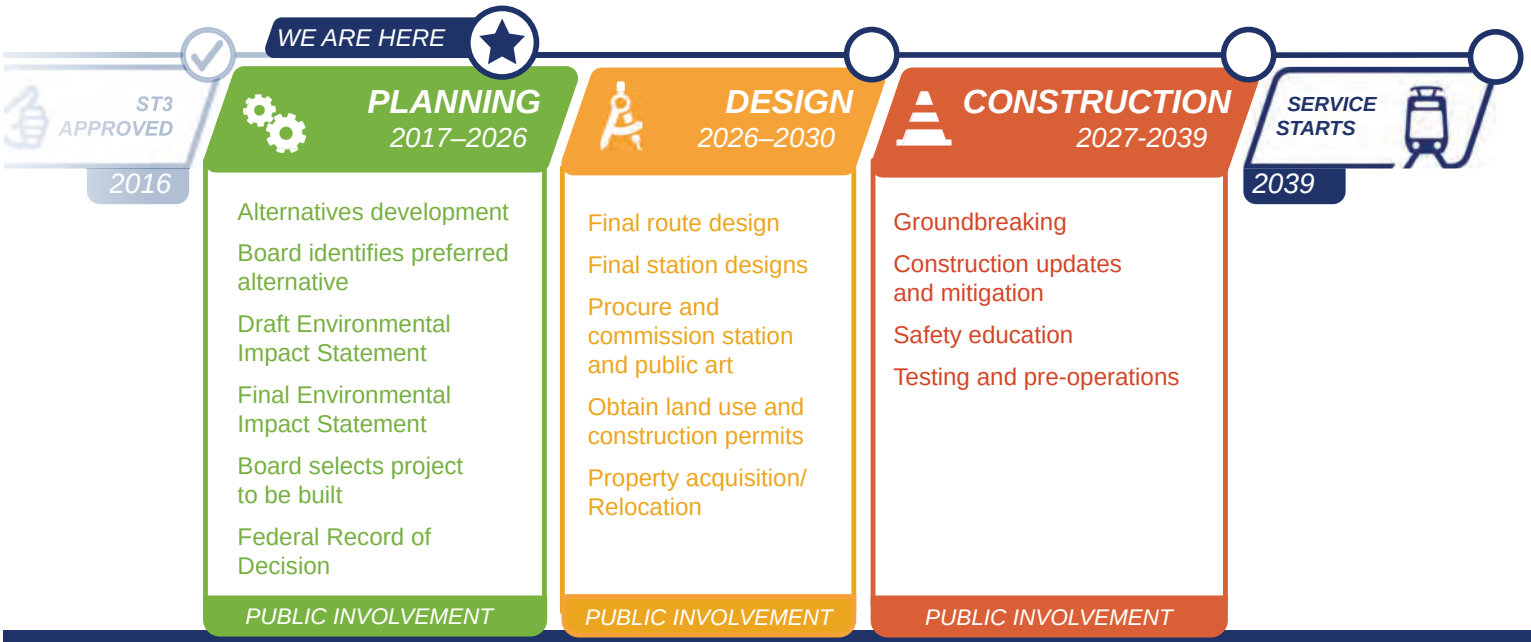
Ballard Link Extension project timeline



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Planning phase

Alternatives development

- **2018:** Early scoping
- **2018-2019:** Neighborhood forums, Stakeholder Advisory Group, Elected Leadership Group
- **2019:** Scoping and public comment period
- **2019:** Board identifies preferred alternatives and other alternatives to study in an environmental impact statement (EIS)

2018: Stakeholder Advisory Group meetings

2019: Scoping meetings

2019-2020: Station planning neighborhood forums

Planning phase

Environmental review

- **2022:** Publish West Seattle and Ballard Link Extensions Draft EIS and public comment period
- **2022-2023:** Further studies and community engagement
- **2023:** Board confirms or modifies preferred alternatives for the BLE project

2021-2022: Community advisory groups

2022: Draft EIS open house

2022-2023: Further studies open houses and workshops

Why we are scoping (again)?

Next year, Sound Transit will publish a new BLE Draft EIS that builds upon the 2022 WSBLE Draft EIS with analysis of new alternatives and project refinements.

The first stage in this process is a scoping comment period to collect your feedback. However, we are not starting over.

We have been collecting public input on the project since planning began in 2017, and all past comments will be carried forward in the new BLE Draft EIS.

Environmental review process

So, what's an Environmental Impact Statement?

Or, "EIS" for short.

Provides agencies and the public an understanding of environmental consequences and assists in decision-making.

What is scoping?

The EIS scoping period is an opportunity for the public, Tribes and agencies to provide input on the scope of the EIS, including the project's purpose and need, topics or issues to study in the EIS, and light rail route alternatives.

Part of the environmental review process
Extended 45-day public comment period
Seeks public feedback on scope of EIS
Informs Board decision on what to study in EIS*

 * Scope of EIS also subject to Federal Transit Administration (FTA) oversight

What is typically studied in an EIS?

How a project affects…

What is typically studied in an EIS?

Transportation

- Regional transportation
- Transit services
- Arterial and local street systems
- Parking
- Non-motorized facilities
- Safety
- Navigation
- Freight

Natural environment

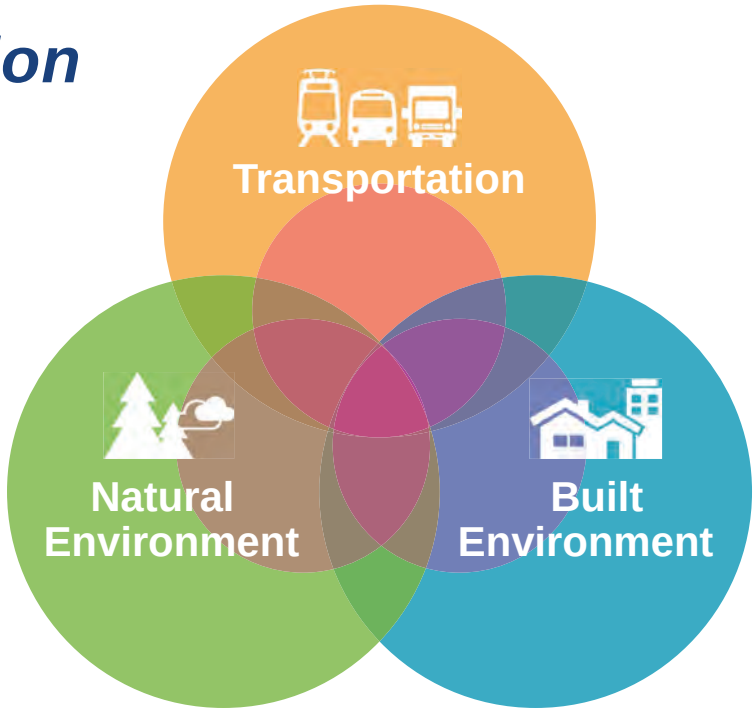
- Air quality and greenhouse gas emissions
- Ecosystems
- Water resources
- Geology and soils

Built environment

- Acquisitions, displacements and relocations
- Noise and vibration
- Economic effects
- Visual resources
- Parks and recreation
- Land use
- Energy
- Hazardous materials
- Public services, safety, and security
- Historic and archaeological resources
- Social resources, community facilities and neighborhoods
- Electromagnetic fields
- Utilities

Equity and inclusion

Environmental justice focus within each area of the EIS



EIS studies:

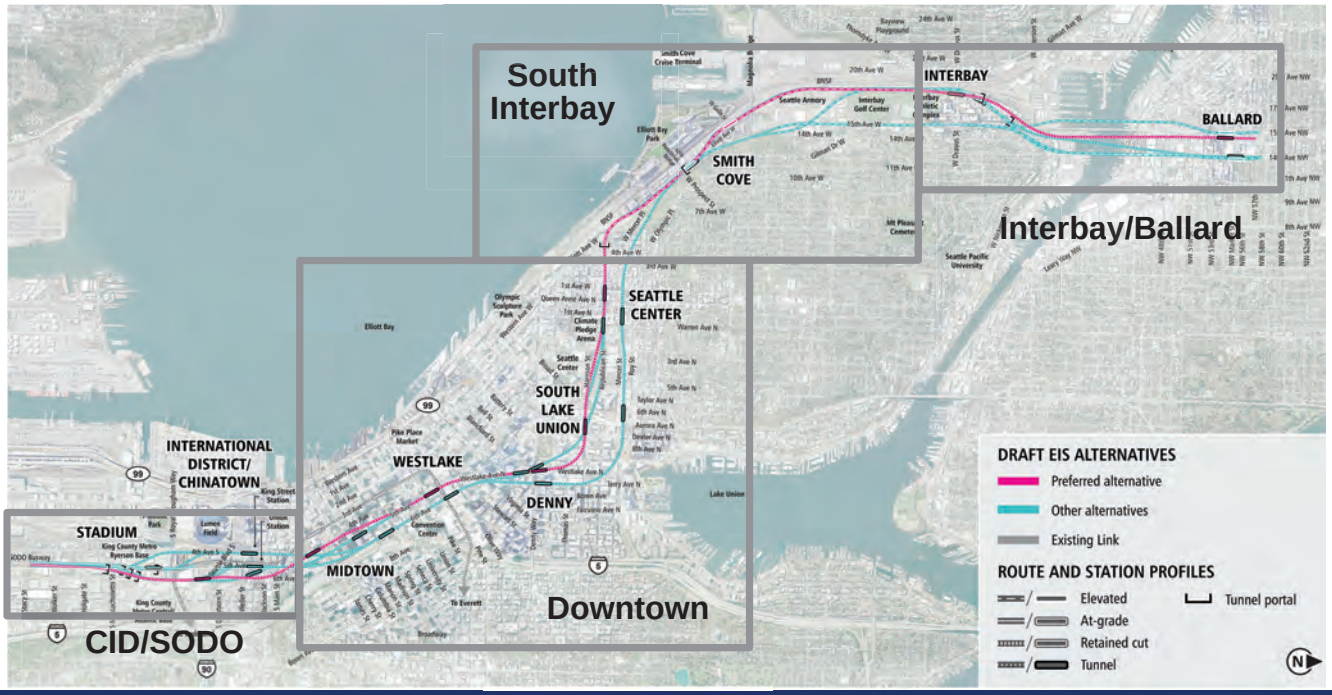
Environmental justice

- Describes demographics
- Evaluates whether project disproportionately impacts low-income and communities of color
- Considers potential project benefits such as improved access to opportunity
- Documents what we hear from outreach efforts

Ballard Link Extension alternatives

- Preferred alternative
- Other EIS alternatives

Draft EIS alternatives – Ballard Link Extension



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Next Steps

Tonight's event

- **Learn:** *visit informational materials, ask staff questions*
- **Share:** *leave a scoping comment on:*
  - *Latest route and station alternatives*
  - *Topics to study in the Environmental Impact Statement*
  - *Project Purpose and Need*

How to provide scoping comments

- ***Comment online:*** *soundtransit.org/ballardlink-design*
- ***Email us:*** *blescoping@soundtransit.org*
- ***Leave a voicemail:*** *206-903-7223*
- ***Mail us:*** *Ballard Link Extension, c/o Lauren Swift, Sound Transit, 401 S. Jackson St., Seattle, WA 98104*
- ***Join us at our second scoping meeting:***
  Nov. 13, 5 – 7 p.m.
  National Nordic Museum, 2655 NW Market St.

Thank you.

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soundtransit.org

Display Boards

Sound Transit future service

Link service plan: 2042

1 Ballard–Tacoma

2 Mariner–Redmond*

3 Everett–West Seattle*

T Tacoma Dome–St Joseph

Transfer

SOUNDTRANSIT

10/2024

Ballard Link Extension project timeline

ST3 APPROVED — 2016

WE ARE HERE

PLANNING 2017 – 2026

2017 – 2023 Alternatives development

- 2018: Early scoping
- 2019: Scoping
- 2019: Board identifies preferred alternatives and other alternatives

WSBLE environmental review

- 2022: Publish WSBLE Draft EIS
- 2023: Board modifies and confirms preferred alternative

2017 – 2023 BLE environmental review

- **Fall 2024: NEPA Scoping**
- **2025: Publish BLE Draft EIS**
- Public comment period
- Board confirms or modifies preferred alternative
- **2026: Publish BLE Final EIS**
- Board selects project to be built
- Federal Record of Decision

PUBLIC INVOLVEMENT

DESIGN 2026 – 2030

- Final route design
- Final station designs
- Procure and commission station and public art
- Obtain land use and construction permits
- Property acquisition/ Relocation

PUBLIC INVOLVEMENT

CONSTRUCTION 2027 – 2039

- Groundbreaking
- Construction updates and mitigation
- Safety education
- Testing and pre-operations

PUBLIC INVOLVEMENT

SERVICE STARTS — 2039

SoundTransit

10/2024

West Seattle and Ballard Link Extensions alternatives development

Nov 2016
Voters approve funding for ST3, including 62 miles of new light rail across the region.

Jan 2018
Sound Transit hosts the first Stakeholder Advisory Group and Elected Leadership Group meetings to introduce the project and share what to expect for the alternatives development process.

Mar 2018 – Apr 2019
Sound Transit develops and refines alternatives based on technical evaluations and public feedback.

May & Oct 2019
The Sound Transit Board identifies route and station locations (alternatives) to study in the WSBLE Draft EIS.

2016 | 2017 | 2018 | 2019

Feb – Mar 2018
Sound Transit hosts early scoping open houses and comment period to collect public feedback on representative route and station locations included in ST3 plan.

May 2018
Sound Transit hosts Neighborhood Forum to gather feedback on what you like about your neighborhood, how you spend time in your area, and how alternatives fit your neighborhood's vision/values.

Feb – Mar 2019
Sound Transit hosts scoping open house and comment period to collect public feedback on route and station locations evaluated to date and topics to study in the WSBLE Draft Environmental Impact Statement (EIS).

Nov 2019
Sound Transit hosts Neighborhood Forums to consolidate feedback on how the stations would best serve communities, what you value about your community, and how you travel around the neighborhood/commute.

Community engagement

SOUNDTRANSIT

09/30/2024

West Seattle and Ballard Link Extensions Draft EIS

Jan 2022
Sound Transit publishes WSBLE Draft EIS for public review and 90-day public comment period and hosts an open house.

Sound Transit publishes the Station Planning Progress Report alongside the Draft EIS to help communities understand the opportunities and challenges of the different alternatives.

Sep 2023
Given additional environmental review needed for project refinements for BLE resulting from the Board action in March 2023, environmental review for the WSLE and BLE projects proceed on different timelines.

Aug 2022 – Mar 2023
Sound Transit conducts further studies that included six workshops and open houses and three online surveys.

2020 2021 2022 2023

Mar & Jul 2023
Sound Transit Board identifies a preferred alternative for BLE.

Nov 2021 – May 2022
Sound Transit kicks off Community Advisory Groups to review and discuss Draft EIS findings.

Jul 2022
Sound Transit Board identifies preferred route and station locations for West Seattle Link Extension (WSLE) and requests further studies for the Ballard Link Extension (BLE).

Community engagement

SOUNDTRANSIT

09/30/2024

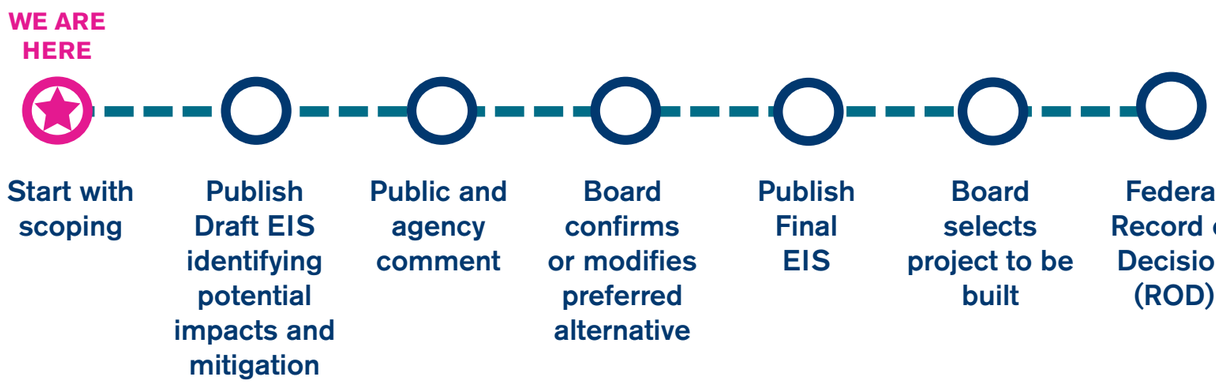
The EIS process

What is an EIS?

In partnership with the Federal Transit Administration, we will publish a new National Environmental Policy Act (NEPA) Draft Environmental Impact Statement (EIS) and Supplemental State Environmental Policy Act (SEPA) Draft EIS for the Ballard Link Extension with analysis of new alternatives and project refinements.

The Draft EIS will provide agencies and the public with an understanding of environmental consequences and assist in decision making.

The EIS process:


WE ARE HERE
Start with scoping
Publish Draft EIS identifying potential impacts and mitigation
Public and agency comment
Board confirms or modifies preferred alternative
Publish Final EIS
Board selects project to be built
Federal Record of Decision (ROD)

What's typically studied in an EIS?

Transportation

- Regional transportation
- Transit services
- Arterial and local street systems
- Parking
- Non-motorized facilities
- Navigation
- Freight

Natural Environment

- Air quality and greenhouse gas emissions
- Ecosystems
- Water resources
- Geology and soils

Built Environment

- Acquisitions, displacements and relocations
- Noise and vibration
- Economic effect
- Visual resources
- Parks and recreation
- Land use
- Energy
- Hazardous materials
- Public services
- Historic and archaeological resources
- Social resources, community facilities and neighborhoods
- Electromagnetic fields
- Utilities

SOUNDTRANSIT

10/2024

What is NEPA scoping?

Why are we scoping (again)?

Next year, Sound Transit will publish a new BLE Draft EIS that builds upon the 2022 WSBLE Draft EIS with analysis of new alternatives and project refinements.

The first stage in this process is a scoping comment period to collect your feedback. ***However, we are not starting over.***

We have been collecting public input on the project since planning began in 2017, and all past comments will be carried forward in the new BLE Draft EIS.

For the BLE, scoping is:

- ✓ A part of the federal environmental review process
- ✓ An extended 45-day public comment period
- ✓ A process that seeks public feedback on the scope of the EIS
- ✓ Something that informs Board decision on what to study in EIS*

* Scope of EIS also subject to Federal Transit Administration oversight

What feedback is collected during the scoping comment period?

The **scoping comment period** seeks feedback related to…

- Project Purpose and Need
- Alternatives to be studied in the EIS
- Potential topics to study in the EIS

The **Draft EIS comment period**, anticipated in 2025, seeks feedback on:

- Potential environmental impacts and benefits of each alternative
- Proposed actions that will help mitigate impacts

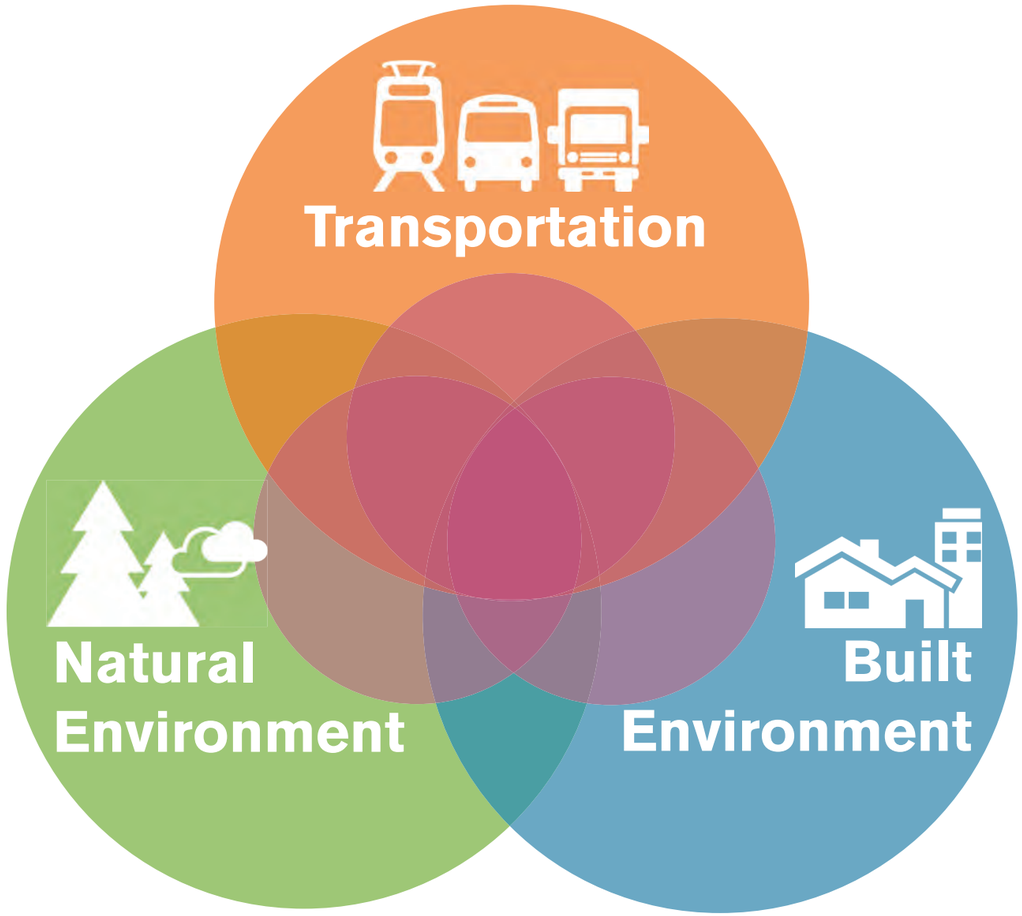
SOUNDTRANSIT

10/2024

Environmental Justice in the EIS

In an Environmental Impact Statement, the Environmental Justice chapter:

- ✓ Describes demographics
- ✓ Evaluates whether project disproportionately impacts low-income and communities of color
- ✓ Considers potential project benefits such as improved access to opportunity
- ✓ Documents what we hear from outreach efforts



There's an environmental justice focus within each area of the EIS

SOUNDTRANSIT

Comment here!

Share your NEPA scoping comments with a court reporter tonight!

What's a helpful comment during the scoping period?

1. Feedback related to the project Purpose and Need
2. Feedback related to the alternatives to be studied in the EIS
3. Feedback related to potential topics to study in the EIS

You can also provide scoping comments before Dec. 9 by:

Filling out a comment card

Commenting online: soundtransit.org/ballardlink-design

Emailing us: blescoping@soundtransit.org

Leaving a voicemail: 206-903-7223

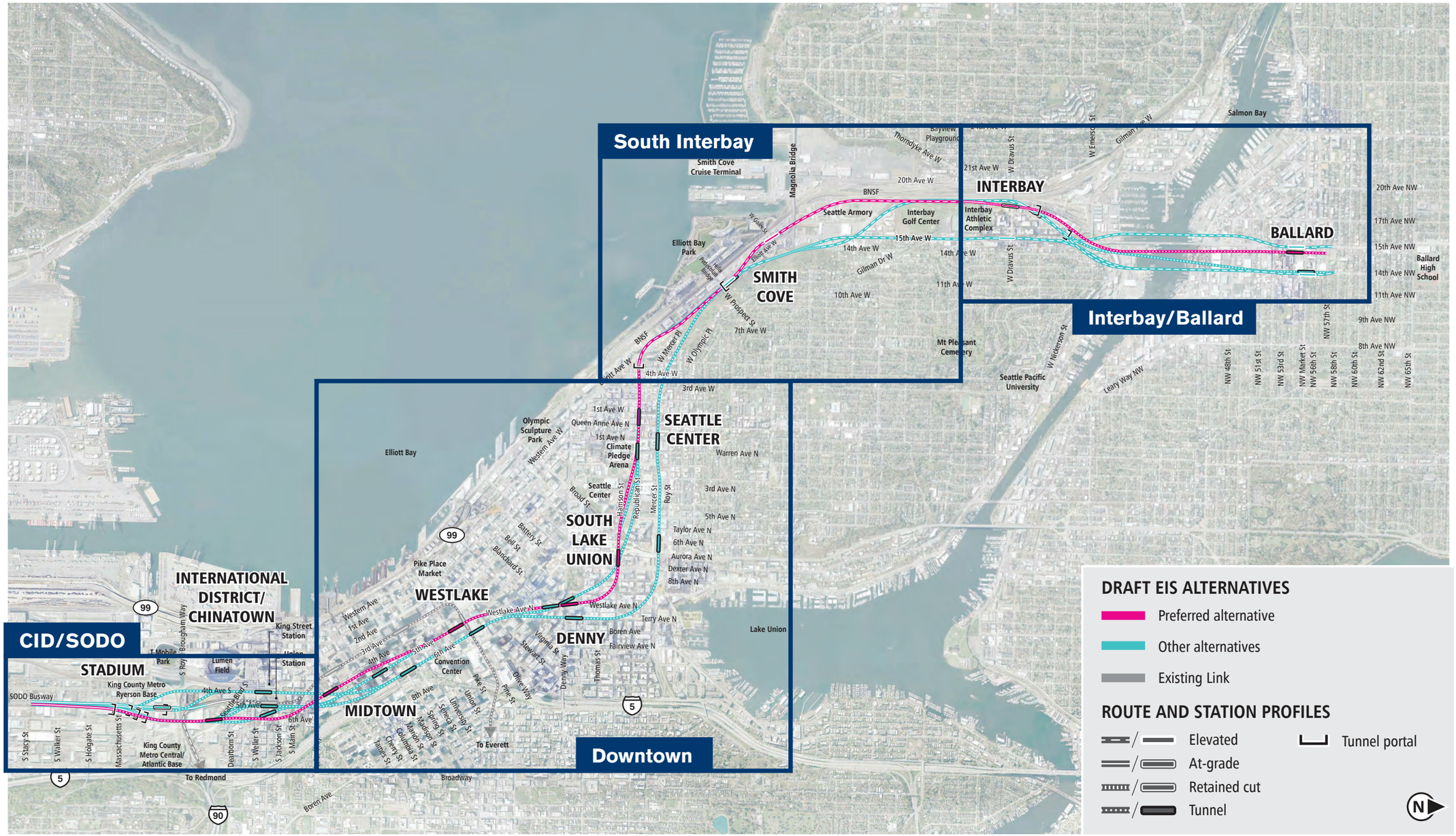
Mailing us: Ballard Link Extension
c/o Lauren Swift
Sound Transit, 401 S. Jackson St.
Seattle, WA 98104

SOUNDTRANSIT

10/2024

Ballard Link Extension route and station alternatives

Your feedback helped get us here!



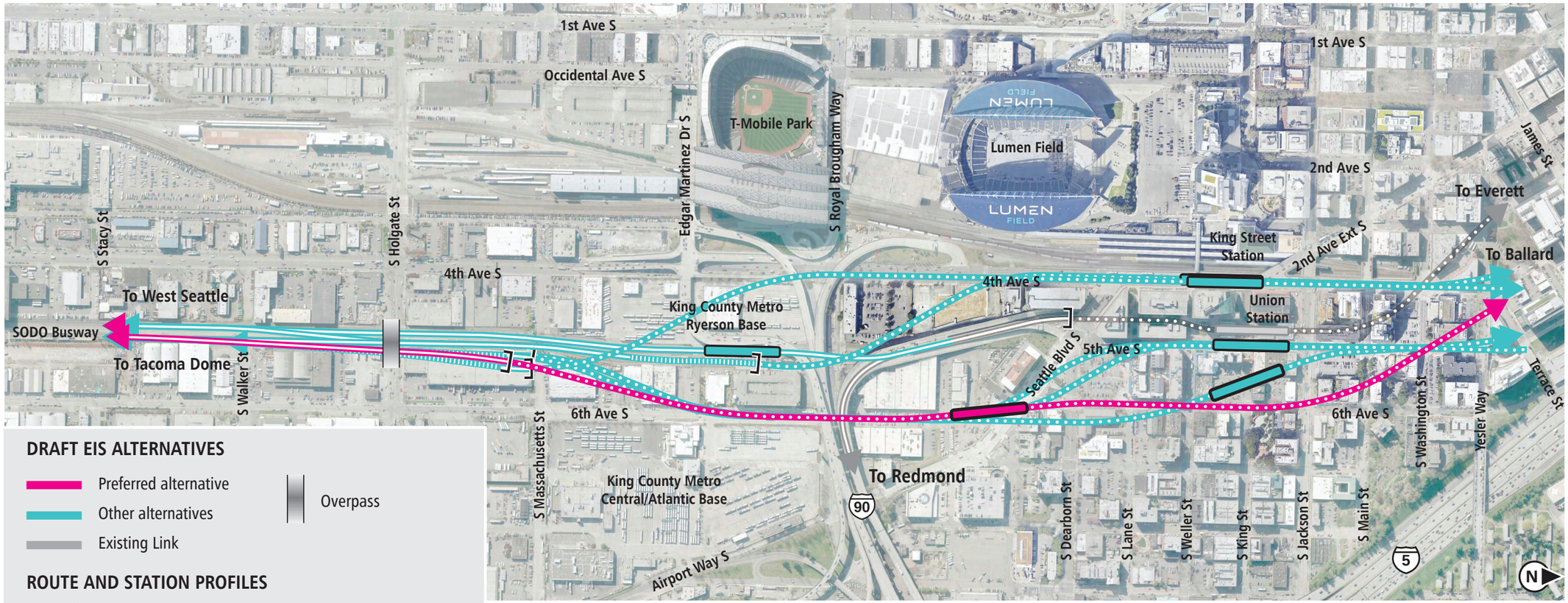
Diagrams are not to scale and all measurements are approximate for illustration purposes only.

SOUNDTRANSIT

10/2024

Ballard Link Extension alternatives in CID/SODO

Your feedback helped get us here!



DRAFT EIS ALTERNATIVES

- Preferred alternative
- Other alternatives
- Existing Link
- Overpass

ROUTE AND STATION PROFILES

- At-grade
- Retained cut
- Tunnel
- Tunnel portal

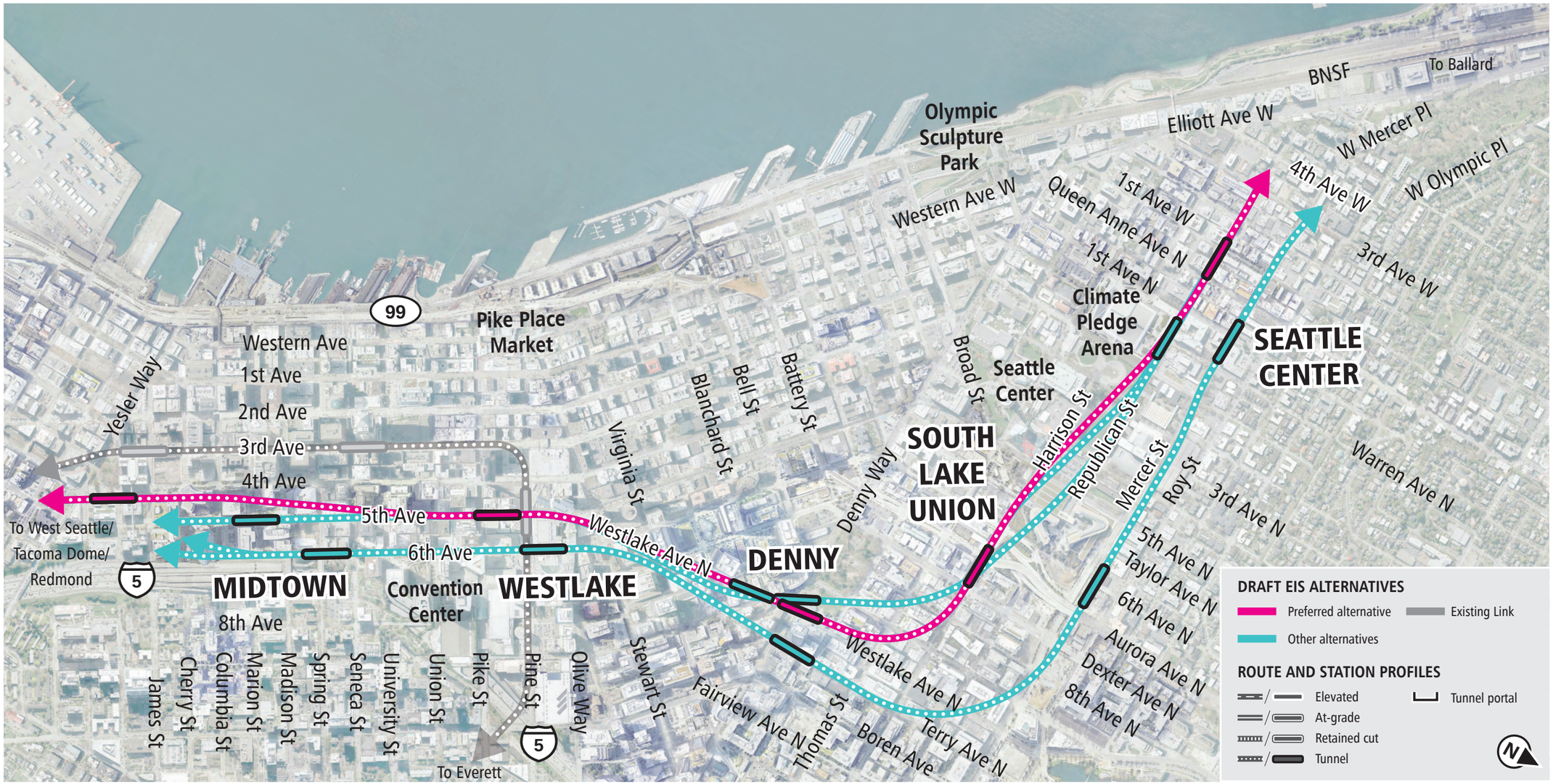
Note: The International District/Chinatown Station 4th Avenue Shallow and 4th Avenue Shallower Alternatives would necessitate reconstruciton of the existing Stadium Station. Diagrams are not to scale and all measurements are approximate for illustration purposes only.

SOUNDTRANSIT

10/2024

Ballard Link Extension alternatives in Downtown

Your feedback helped get us here!



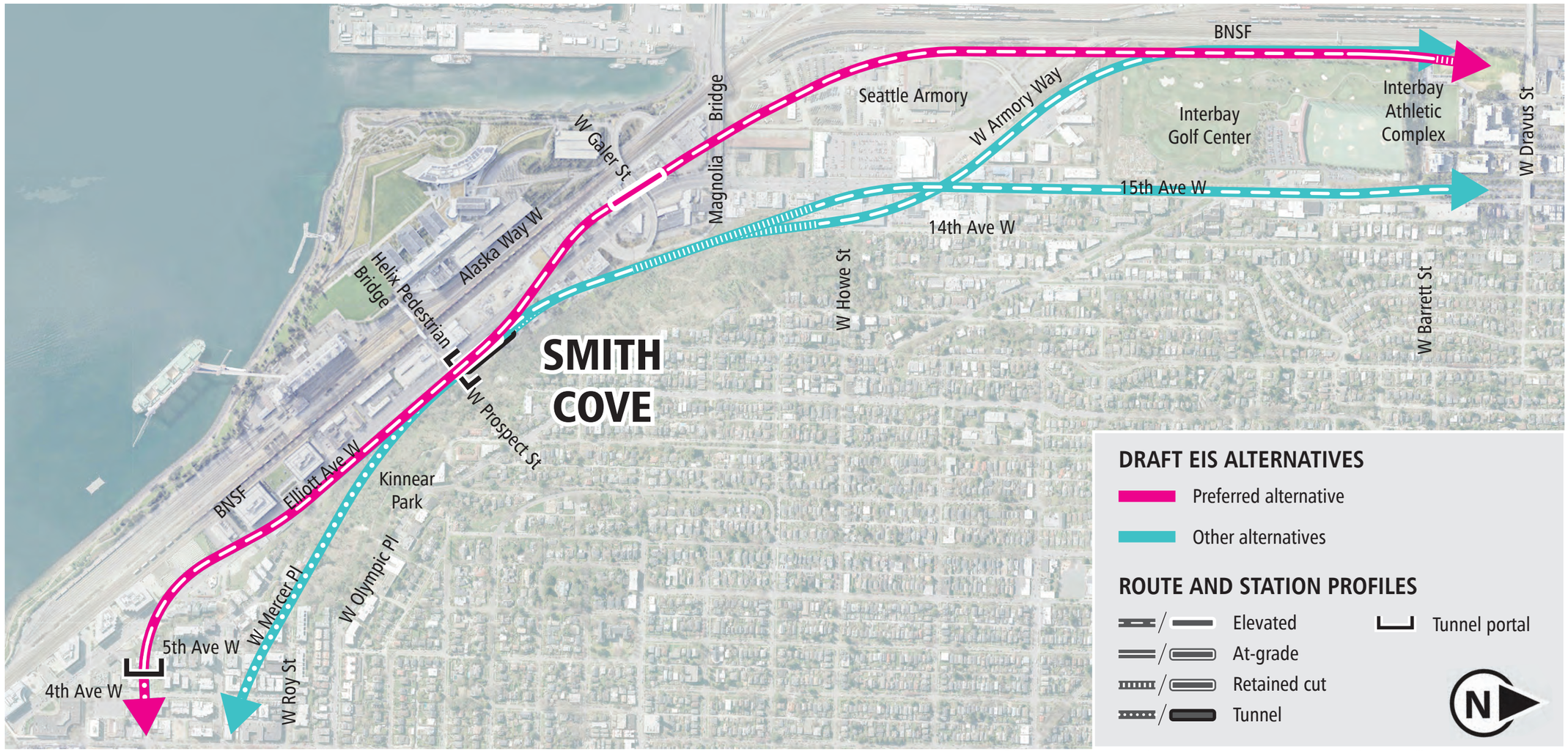
Diagrams are not to scale and all measurements are approximate for illustration purposes only.

SOUNDTRANSIT

10/2024

Ballard Link Extension alternatives in South Interbay

Your feedback helped get us here!



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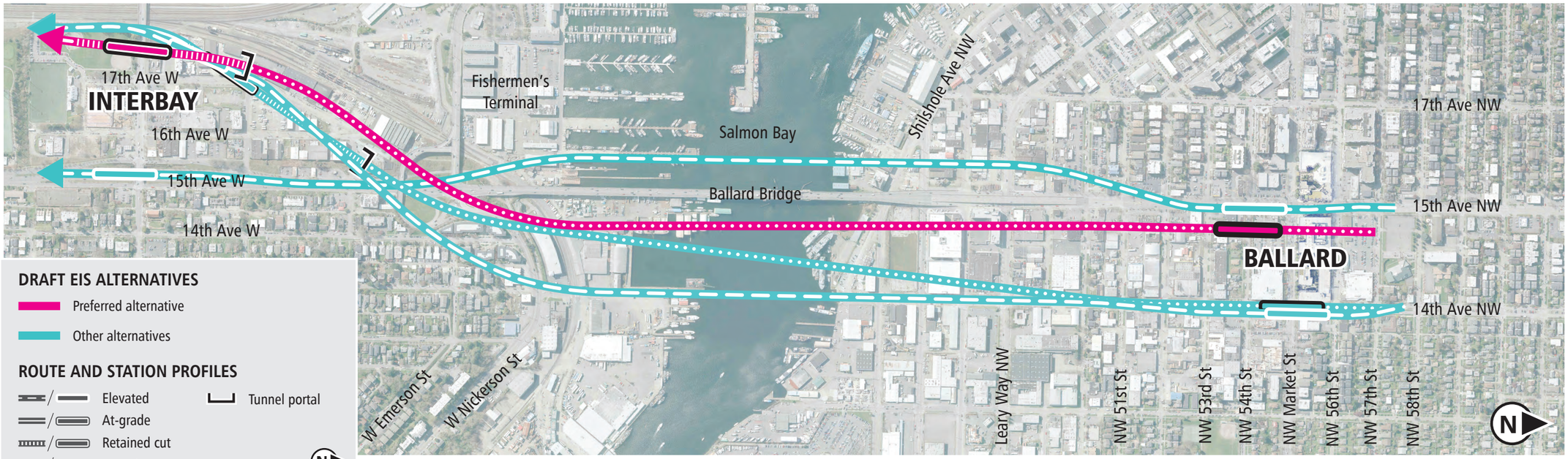
SOUNDTRANSIT

10/2024

Ballard Link Extension alternatives in Interbay/Ballard

Your feedback helped get us here!



Diagrams are not to scale and all measurements are approximate for illustration purposes only.

SOUNDTRANSIT

10/2024

Project fact sheet

February 2024

Ballard Link Extension

Expanding light rail in Seattle

About the project

The Ballard Link Extension will provide fast, reliable light rail connections to dense residential and job centers between Chinatown-International District and Ballard. In addition, a new downtown Seattle light-rail only tunnel will increase capacity and improve efficiency for the entire regional system.

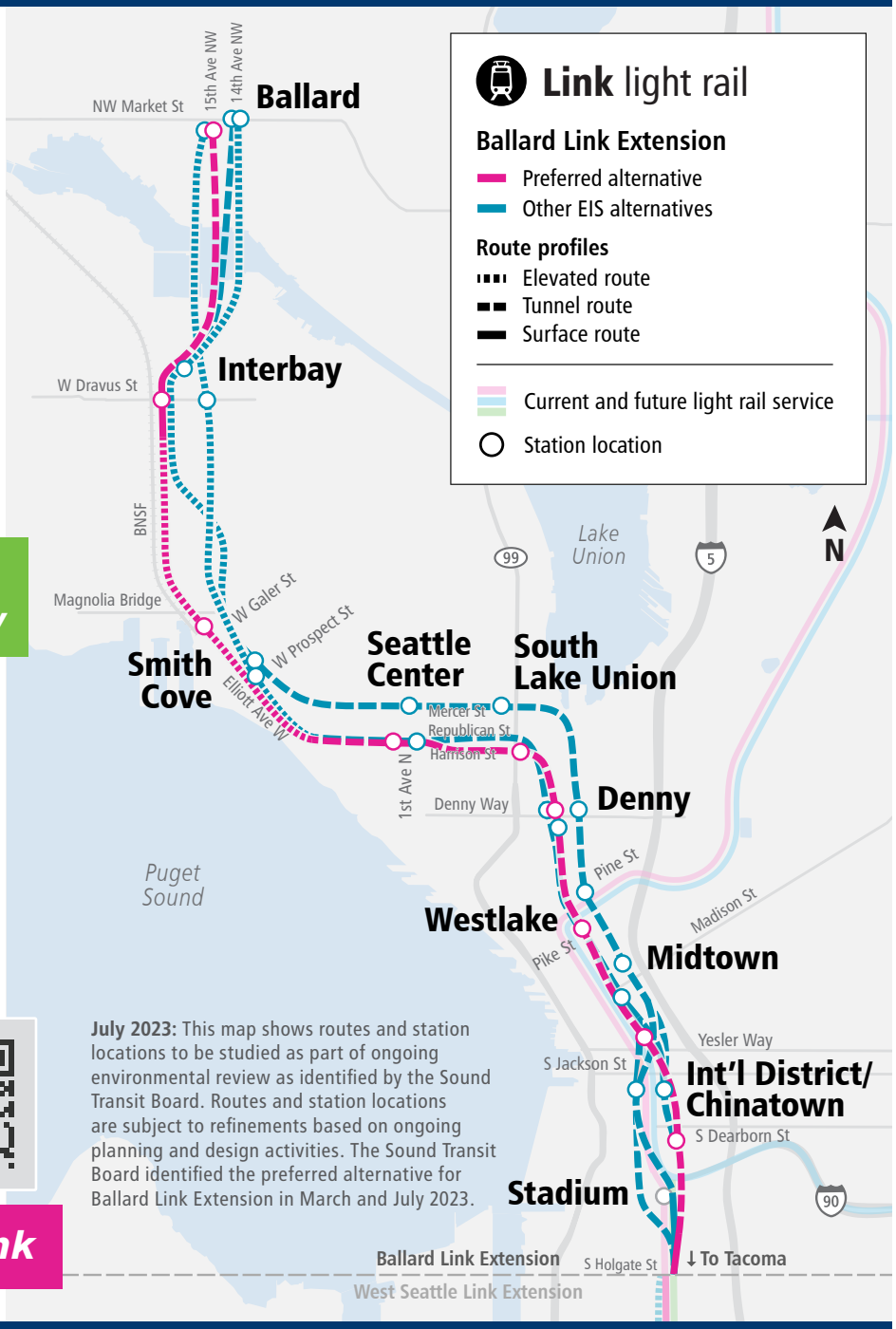
CURRENT PHASE
Planning: Environmental review

Project benefits

- **Adds 7.7 miles of light rail service** from downtown Seattle to the Ballard neighborhood, including a new downtown Seattle rail-only tunnel.
- **Includes nine new stations** from Chinatown-International District to Ballard.

Learn more, subscribe for email updates, and find out how to get involved:

soundtransit.org/ballardlink



July 2023: This map shows routes and station locations to be studied as part of ongoing environmental review as identified by the Sound Transit Board. Routes and station locations are subject to refinements based on ongoing planning and design activities. The Sound Transit Board identified the preferred alternative for Ballard Link Extension in March and July 2023.

Project timeline

401 S. Jackson St. | Seattle, WA 98104
800-201-4900 / TTY: 711 | main@soundtransit.org | soundtransit.org

SOUNDTRANSIT / Powering progress

Link passengers board and deboard a train at Roosevelt Station.

What's next for Ballard Link?

A new Draft Environmental Impact Statement (EIS) will be completed for Ballard Link. Service is scheduled to start in 2039.

Stay involved

Sound Transit is committed to meaningful public participation. We offer both in-person and virtual engagement opportunities to accommodate the community's needs. Reach out with questions, thoughts, or to request a briefing for your community group.

Equity and inclusion

We are also committed to inclusively engaging historically-underrepresented communities. If you are interested in learning more about this project and how it may affect your community, please contact us and we will work with you to find an appropriate medium for providing project information.

How did we get here?

From 2017-2019, project staff conducted an extensive alternatives development process that resulted in the Sound Transit Board identifying preferred alternatives and other alternatives to study in a Draft EIS.

The West Seattle and Ballard Link Extensions were evaluated together in a Draft EIS published in January 2022. The public comment period lasted for 90 days between January and April 2022.

The Sound Transit Board requested further studies for the Ballard Link Extension (BLE) in July 2022. Sound Transit staff held community workshops, open houses, stakeholder meetings, and surveys between September 2022 and January 2023. The Sound Transit Board identified a preferred alternative for the Ballard Link Extension in March and July 2023. Given additional environmental review needed for project refinements for BLE, environmental review for the West Seattle Link Extension and BLE projects are proceeding on different timelines.

Questions?

Contact the Community Engagement team:
ballardlink@soundtransit.org or 206-903-7223.

Interpreter 800-823-9230
Español 漢語 한국어 日本語
Tagalog русский язык Tiếng Việt

401 S. Jackson St., Seattle, WA 98104 | main@soundtransit.org
soundtransit.org | 888-889-6368/TTY: 711 | To request information in alternative formats call 800-201-4900/TTY: 711 or email accessibility@soundtransit.org.

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Scoping comment form

Ballard Link Extension

Share your scoping comments by Dec. 9, 2024
在12月9日前分享您對範圍界定的意見
在12月9日前分享您对范围界定的意见
Hãy chia sẻ ý kiến của quý vị về việc xác định phạm vi chậm nhất vào ngày 9 tháng 12
Comparta sus comentarios sobre el alcance antes del 9 de dec. de 2024

Optional/選修的/选修的/Không bắt buộc/Opcional

Please provide your contact information and check the box below if you would like to receive project updates.
如果您想要獲取項目的更新資訊，請提供您的聯絡資訊，並勾選下列方塊。
如果您想收到项目的更新信息，请提供您的联系信息并勾选下面的方框。
Vui lòng cung cấp thông tin liên lạc của quý vị và đánh dấu vào hộp bên dưới nếu quý vị muốn nhận thông tin cập nhật về dự án.
Proporcione su información de contacto y marque la siguiente casilla si le gustaría recibir las últimas noticias del proyecto.

Name/姓名/姓名/Tên/Nombre_____

Organization/ 機構/组织/Tổ chức/Organización_____

Address/地址/地址 /Địa chỉ/Dirección_____

Email/電子郵件/电子邮箱 /Email/Correo electrónico_____

Phone/電話/电话 /Điện thoại/Teléfono_____

- ☐ Sign me up for Ballard Link Extension email updates
- ☐ 注冊以接收Ballard Link擴展項目的最新消息電子郵件。
- ☐ 注册以接收Ballard Link扩展项目的最新消息电子邮件。
- ☐ Đăng ký nhận thông tin cập nhật qua email về Dự Án Mở Rộng Tuyến Ballard Link.
- ☐ Regístrenme para recibir por correo electrónico las últimas noticias de la Extensión de Link a Ballard

Thank you for taking the time to comment! **Cảm ơn quý vị đã dành thời gian đóng góp ý kiến!**
感謝您撥冗發表意見！ **感谢您拨冗发表意见！** **¡Gracias por tomarse el tiempo para hacer comentarios!**

SOUNDTRANSIT

Ballard Link Extension

Questions?

Contact the Community Engagement team:
ballardlink@soundtransit.org or 206-903-7223.

401 S. Jackson St., Seattle, WA 98104 | main@soundtransit.org
soundtransit.org | 888-889-6368/TTY: 711 | To request information in alternative formats call 800-201-4900/TTY: 711 or email accessibility@soundtransit.org.

Interpreter 800-823-9230

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Appendix C: Online Open House

On Oct. 24, 2024, Sound Transit began the National Environmental Policy Act (NEPA) scoping process for the Ballard Link Extension (BLE). We are seeking feedback on the Purpose and Need, alternatives, and potential topics to be studied in the BLE Draft Environmental Impact Statement (EIS). The 45-day scoping comment period ends on Dec. 9.

About the Ballard Link Extension

The Ballard Link Extension (BLE) will provide fast, reliable light rail connections to dense residential and job centers in the Chinatown-International District (CID), Downtown, Interbay, and Ballard neighborhoods. In addition, a new downtown Seattle light rail tunnel will provide capacity for the entire regional system to operate efficiently. The BLE is part of the Sound Transit 3 system expansion approved by voters in November 2016. The project is currently in the planning phase.

Ballard Link Extension

- Adds 7.7 miles of light rail service from downtown Seattle to the Ballard neighborhood, including a new downtown Seattle rail-only tunnel.
- Includes nine new stations from Chinatown-International District to Ballard.
- Will greatly improve local and regional transit service frequency, reliability, and capacity.
- Facilitates redevelopment near stations, focusing on equitable transit-oriented development (eTOD).
- Start of service is scheduled for 2039.

Stay engaged!

Get upcoming project news and public involvement opportunities.

Subscribe now

Ballard Link Extension project timeline

2016 Voter Approval ✔

2017-2023 WSBLE Planning

- Alternatives development ✔
- ST Board identifies preferred and other WSBLE Draft EIS alternatives ✔
- WSBLE Draft EIS and public comment period ✔
- Further Studies ✔
- ST Board modifies the Preferred Alternative for BLE ✔

2024-2026 BLE Planning

- NEPA scoping (**we are here**)
- BLE Draft EIS publication and public comment period (2025)
- ST Board confirms or modifies the BLE Preferred Alternative (mid-2025)
- BLE Final EIS (2026)
- ST Board selects BLE project to be built (2026)
- Federal Transit Administration issues Record of Decision on BLE (2026)

2026-2030 Design

- Procure final design and construction contracts
- Obtain land use and construction permits
- Begin property acquisition / relocation
- Advance utility relocation / early work contracts

2027-2039 Construction

NEPA scoping

We've been collecting your feedback to identify potential alignments and inform our study of the Ballard Link Extension (BLE) alternatives since 2017. As part of our environmental review process, we have a range of alternatives that are being carried forward into the National Environmental Policy Act (NEPA) scoping. This scoping comment period is intended to collect feedback on the Purpose and Need, alternatives, and potential topics to be studied in the BLE Draft Environmental Impact Statement (EIS).

The 45-day NEPA scoping comment period ends on Dec. 9.

Attend an event or comment now

Following scoping, Sound Transit will publish a new BLE Draft EIS including a public comment period to gather feedback on the environmental impacts and benefits of each alternative and proposed actions that will help mitigate impacts.

- Demolition and clearing where necessary to build and operate the light rail guideway
- Earth work such as stormwater systems, column footings, retaining walls and tunneling
- Guideway and station construction
- Ongoing conversations with anyone affected by construction
- Safety education
- Testing and preparations

2039 Start of Service

Ballard Link Extension project map

Preferred and other alternatives we are currently evaluating. | Click on image to enlarge

CID Station Additional Study Results

Learn more about construction approach and duration CID Station alternatives, efforts to maximize regional and local connections and accessibility, including opportunities to advance improvement projects and public transit connections through the South Downtown Hub planning process.

Learn more

NEPA scoping

For those following along, we have done project scoping before. In 2018 and 2019, Sound Transit hosted scoping events and offered a comment period to collect public feedback on the West Seattle and Ballard Link Extensions (WSBLE) project. What does this second round of scoping look like for BLE? Many of you have provided thoughtful comments and feedback over several years of engagement. Your input, concerns, and ideas have, and will continue to, inform the BLE Draft EIS alternatives and Sound Transit Board decisions. As we enter this new scoping period, we invite you to share additional and new feedback with us.

After release of the WSBLE Draft EIS and a 90-day comment period in 2022, the Sound Transit Board directed Further Studies of BLE alternatives. These Further Studies led to Board actions in March and July 2023 which added new alternatives and modified the preferred alternatives for the BLE. As a result, it was determined that the WSLE and BLE projects would move on two separate environmental review timelines. The West Seattle Link Extension (WSLE) proceeded to a Final EIS, and the BLE requires a new National Environmental Policy Act (NEPA) Draft EIS/State Environmental Policy Act (SEPA) Supplemental Draft EIS.

Scoping offers an opportunity to gather feedback on project alternatives, project purpose and need, and potential benefits and topics to study at the beginning of the environmental review process. Sound Transit is planning for this scoping process and public comment period by preparing materials and engagement opportunities to inform community members about the BLE project history, development of alternatives and identification of the Preferred Alternative alignment by the Board. We will carry forward public feedback and comments collected from the start of the project as part of the ongoing environmental review phase.

At the conclusion of the NEPA scoping process, we will prepare a Draft EIS in coordination with the Federal Transit Administration (FTA), with publication anticipated in 2025.

What feedback is collected during the scoping comment period?

The **scoping** comment period seeks feedback related to…

- Project Purpose and Need
- Alternatives to be studied in the EIS
- Potential topics to study in the EIS

The **Draft EIS** comment period, anticipated in 2025, seeks feedback on…

- Potential environmental impacts and benefits of each alternative
- Proposed actions that will help mitigate impacts

Project purpose and need

The purpose of the project is to expand the Sound Transit Link light rail system from SODO to Ballard, to make appropriate community investments to improve mobility, and to increase capacity and connectivity for regional connections to achieve the following:

- Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan (Sound Transit 2016).
- Improve regional mobility by increasing connectivity and capacity through Downtown Seattle to meet the projected transit demand.
- Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan (Sound Transit 2014a).
- Implement a system that is technically and financially feasible to build, operate, and maintain.
- Expand mobility for the corridor and the region's residents, which include transit-dependent residents, low-income people, and communities of color.
- Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development and multi-modal integration in a manner that is consistent with local land use plans and policies, including Sound Transit's Equitable Transit Oriented Development Policy (Sound Transit 2018) and Sustainability Plan (Sound Transit 2019).
- Encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections, consistent with Sound Transit's System Access Policy (Sound Transit 2013).
- Preserve and promote a healthy environment and economy by minimizing adverse impacts on the natural, built, and social environments through sustainable practices.

The project is needed because:

- When measured using national standards, existing transit routes between SODO and Ballard currently operate with poor reliability. Roadway congestion in the project corridor will continue to degrade transit performance and reliability as the city is expected to add about 287,000 people and about 214,000 jobs between 2018 and 2050 (Puget Sound Regional Council 2023).
- Increased ridership from regional population and employment growth will increase operational frequency in the existing Downtown Seattle Transit Tunnel, requiring additional tunnel capacity.
- Puget Sound Regional Council (the regional metropolitan planning organization) and local plans call for high-capacity transit in the corridor consistent with VISION 2050 (Puget Sound Regional Council 2020) and the Regional Transit Long-Range Plan (Sound Transit 2014a).
- The region's residents and communities, including transit-dependent people, low-income people, and communities of color, need long-term regional mobility and multi-modal connectivity as called for in the Washington State Growth Management Act (Revised Code of Washington 36.70A.108).
- Regional and local plans call for increased residential and/or employment density at and around high-capacity transit stations and increased options for multi-modal access. VISION 2050 has a goal for 65 percent of the region's population and 75 percent of the region's employment to occur in regional growth centers and within walking distance of transit.
- Environmental and sustainability goals of the state and region, as established in Washington state law and embodied in Puget Sound Regional Council's VISION 2050 (2020) and 2022-2050 Regional Transportation Plan (2022), include reducing greenhouse gas emissions by prioritizing transportation investments that decrease vehicle miles traveled.

How did we get here?

November 2016: Sound Transit 3 Ballot Measure

- Sound Transit 3 (ST3) is approved by voters. This plan includes adding 62 new miles of light rail, totaling more than 116 miles with over 80 stations added to the region. Part of this plan includes the West Seattle Link and Ballard Link Extensions (WSBLE) projects, other projects like the bus Rapid Transit (BRT) on the Eastside, additional capacity for the Sounder South line, and access improvements to stations for all modes of travel.

2017 – 2019: WSBLE Alternatives Development

- *October 2017*: West Seattle Link and Ballard Link Extensions project kicks off the planning phase of the project. The phase is part of the Federal Transit Administration's (FTA) environmental review process.
- *January 2018*: Sound Transit hosts the first Stakeholder Advisory Group and Elected Leadership Group meetings to introduce the project and share what to expect for the alternatives development phase.
- *February – March 2018*: Sound Transit hosts **early scoping** open houses and a comment period to collect public feedback on the ST3 representative project and gather new ideas to inform development of additional route and station location alternatives.
- *March 2018 – April 2019*: Sound Transit develops and refines alternatives based on technical evaluations, as well as feedback from the public, Stakeholder Advisory Group, Elected Leadership Group, and Sound Transit Board of Directors. The project goes through three levels of evaluation between early scoping and scoping to help further refine alternatives.
- *February – March 2019*: Sound Transit hosts **scoping** open houses and a comment period to collect public feedback on the alternatives to date and topics to study in the Draft Environmental Impact Statement (EIS).
- *May 2019*: The Sound Transit Board reviews the alternatives, evaluation results, public feedback, and the recommendations of the Elected Leadership Group and identifies the preferred alternative and other alternatives to study in the WSBLE Draft EIS.

- *May – October 2019*: The Sound Transit Board directs staff to conduct initial assessments on additional route and station options that were suggested during the public scoping period, to establish whether further study in the WSBLE Draft EIS is appropriate.

2019 – 2023 WSBLE Draft Environmental Impact Statement

- *May 2019 – December 2021*: Sound Transit develops the WSBLE Draft EIS, a document that describes the multiple alternatives being considered, and how each alternative might affect the natural and built environment and transportation systems, both during construction and final operation of the light rail lines.
- *November 2019 – January 2020*: Sound Transit conducts extensive engagement efforts to gather public feedback regarding WSBLE Station Planning. Sound Transit hosts neighborhood forums and community briefings throughout the project corridor.
- *November 2021 – May 2022*: Sound Transit kicks off Community Advisory Groups to review and discuss WSBLE Draft EIS findings with community members throughout the corridor. Meetings are online and open to the public.
- *January 2022 – April 2022*: The Draft EIS is published for a 90-day public review and comment period. Comments are accepted via email, mail, voicemail, comment form, at a virtual public hearing, or an in-person open house. All the details can be found here. Sound Transit receives over 5,000 comments. Additionally, in partnership with the City of Seattle and King County, Sound Transit publishes the WSBLE Station Planning Progress Report alongside the WSBLE Draft EIS to help communities understand the opportunities and challenges of the different alternatives.
- *July 2022*: After reviewing the Draft EIS and the comments from Tribes, the public and agency partners, the Sound Transit Board identifies the preferred alternative for the West Seattle Link Extension (WSLE) and requested further studies for the Ballard Link Extension (BLE). Read the July 2022 Board Motion and press release for more information.
- *August 2022 – March 2023*: Sound Transit conducts further studies that included six workshops and open houses and three online surveys for WSBLE. For an overview of the further studies conducted for both extensions and the results, read the Further Studies Executive Summary and reports.
- *March and July 2023*: The Sound Transit Board identifies a preferred alternative for the BLE. Refinements to WSLE alternatives from the further studies are being incorporated into the WSLE Final EIS. Read the March Board Motion, July Board Motion, and press release for more information.
- *September 2023*: Given additional environmental review needed for project refinements for BLE resulting from the Sound Transit Board action in March 2023, environmental review for the WSLE and BLE projects proceed on different timelines.

2023 – 2026: Ballard Link Extension (BLE)'s Draft and Final Environmental Impact Statement

- *2023 – 2024*: Sound Transit and FTA will begin development of a Draft EIS for BLE.
- *December 2023*: The Sound Transit Board directs Sound Transit staff to conduct a feasibility study of a new alternative location in the area of 5th Avenue North and Harrison for the South Lake Union (SLU) Station. Read the Board Motion for more information.

Alternatives

Choose a segment below to view the BLE route and station options. The preferred alternatives indicate a preference for alternatives based on currently available information, and is not a decision on the project to be built.

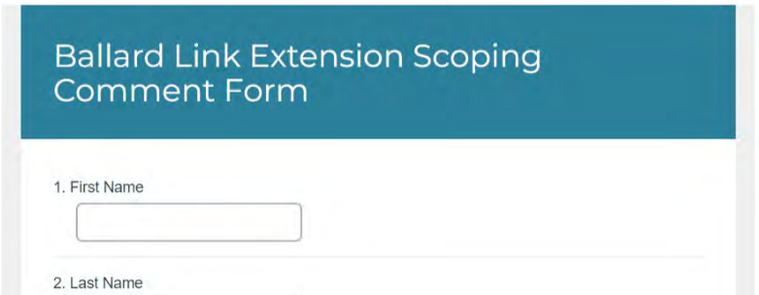
CID/SODO | **Downtown**

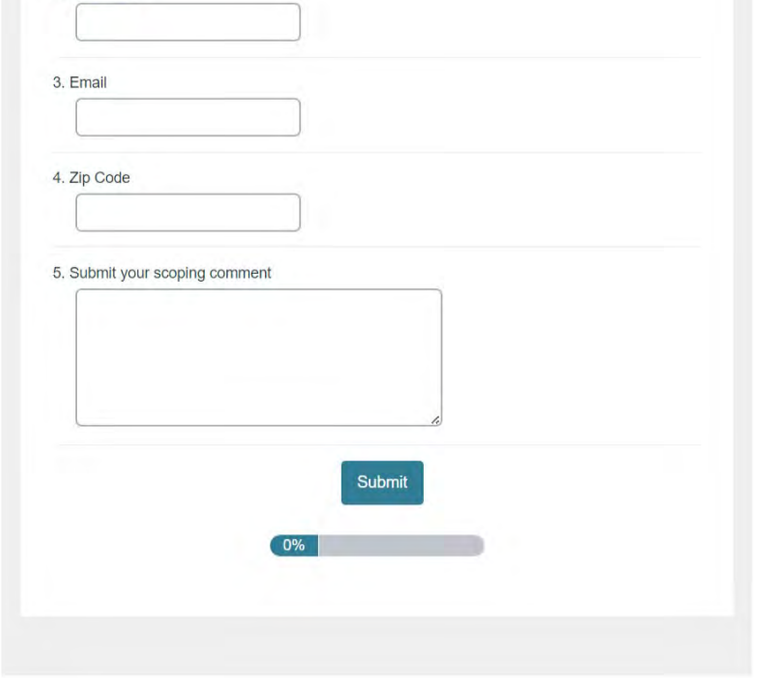
South Interbay | **Interbay-Ballard**

Comment

We've been collecting your feedback to identify potential alignments and inform our study of BLE alternatives since 2017. As part of our environmental review process, we have a range of alternatives that are being carried forward into the National Environmental Policy Act (NEPA) scoping. This scoping comment period is intended to collect feedback on the Purpose and Need, alternatives, and potential topics to be studied in the BLE Draft Environmental Impact Statement (EIS).

Comment online, in person, via mail or by phone. All comments are due by Dec. 9. Learn more at a scoping drop-in event (details below).





Email: blescoping@soundtransit.org

Voicemail: 206-903-7223

Mail: Ballard Link Extension, Attn: Lauren Swift, Sound Transit, 401 S. Jackson St. Seattle, WA 98104

In-person:

Scoping Meeting #1

Nov. 7 from 5 – 7 p.m.

Union Station
401 S Jackson St.
Seattle, WA 98104

Cantonese, Mandarin, and Vietnamese interpretation and translated materials will be available. ASL interpretation will be provided. Refreshments and activities for children will be provided.

Scoping Meeting #2

Nov. 13 from 5 – 7 p.m.

National Nordic Museum
2655 NW Market St.
Seattle, WA 98107

ASL interpretation will be provided. Refreshments and activities for children will be provided.

There will be another comment period after the Draft EIS is published where we will share information and ask for feedback about the potential environmental impacts and benefits of each alternative as well as proposed actions that will help mitigate impacts.

Additional Studies

BLE Further Studies (2022 – 2023)

In July 2022, the Sound Transit Board directed the project team to complete additional further studies. Staff held community workshops, open houses, stakeholder meetings and surveys between September 2022 and January 2023.

For an overview of the further studies conducted for both extensions and the results, read the Further Studies Executive Summary and reports or the Further Studies Engagement Summary. Descriptions and key findings for each further study are included below by segment.

Chinatown-International District/SODO **Downtown** **Interbay/Ballard**

South Lake Union Additional Studies

In 2023 and 2024, the Sound Transit Board directed the project team to study additional station locations and alignment concepts in the South Lake Union area. Materials from these further study periods are included below.

SLU Further Studies (2023) **SLU Feasibility Study (2024)**

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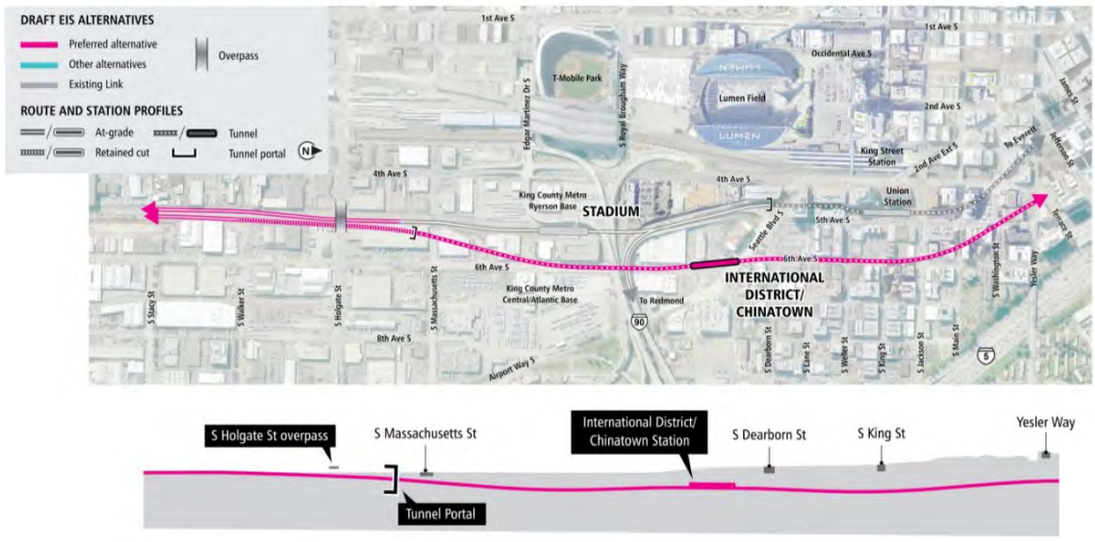
Chinatown-International District/SODO (CID/SODO)

Preferred Alternative: Dearborn Street

The Dearborn Street Alternative would begin north of the SODO station and continue east of the existing Link light rail line and extend north. The alternative would then enter a tunnel heading north beneath 6th Avenue. The tunnel alignment would continue north beneath 6th Avenue South to South Jackson Street and then transition to continue northwest passing under 5th Avenue South.

Station location: The station would be located beneath 6th Avenue South, straddling Seattle Boulevard South.



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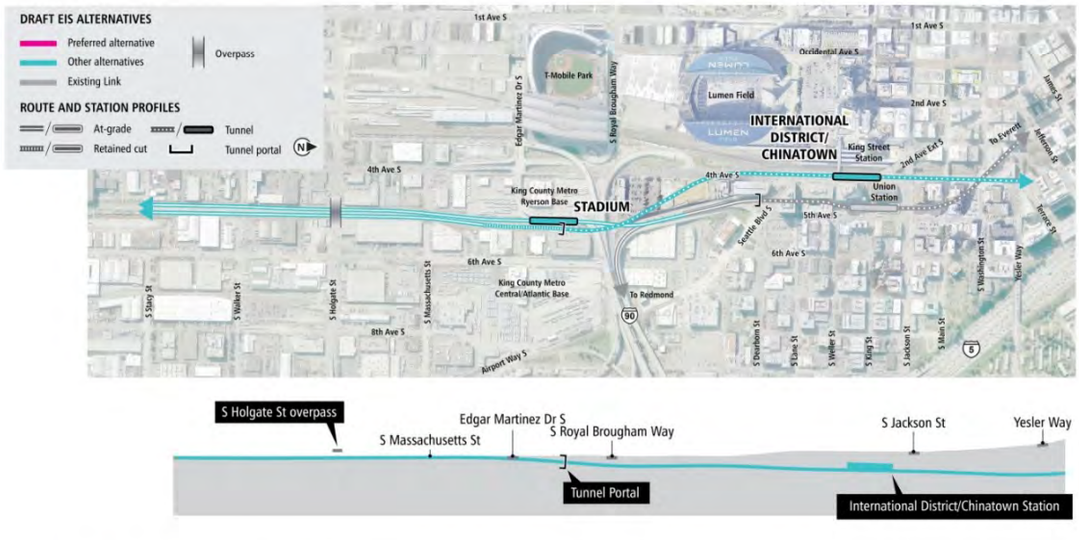
Chinatown-International District/SODO - other alternatives

4th Avenue Shallow

The 4th Avenue Shallow Alternative would begin north of the SODO station and continue east of the existing Link light rail line and extend north. The alternative would then enter a tunnel and continue northwest and then north under 4th Avenue. This alternative would necessitate reconstruction of the existing Stadium Station.

Station location: The station would be located beneath 4th Avenue South, west of and with underground pedestrian connection to the existing International District/Chinatown Station.



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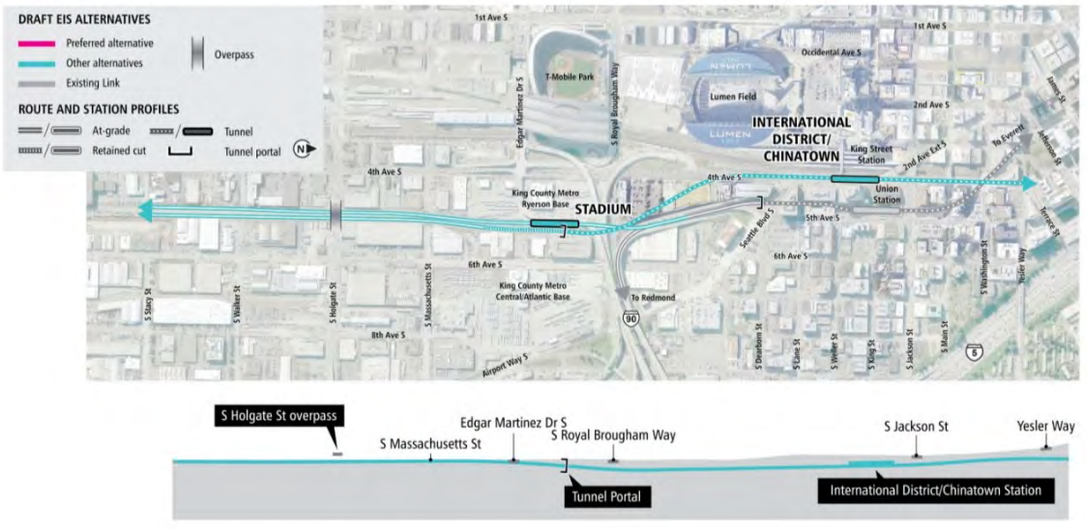
4th Avenue Shallower

The 4th Avenue Shallower Alternative would be the same as the 4th Avenue Shallow Alternative, except it would be shallower in the station area and north of the station. This alternative would necessitate reconstruction of the existing Stadium Station

Station location: The station would be located beneath 4th Avenue South, west of and with underground pedestrian connection to the existing International District/Chinatown Station.



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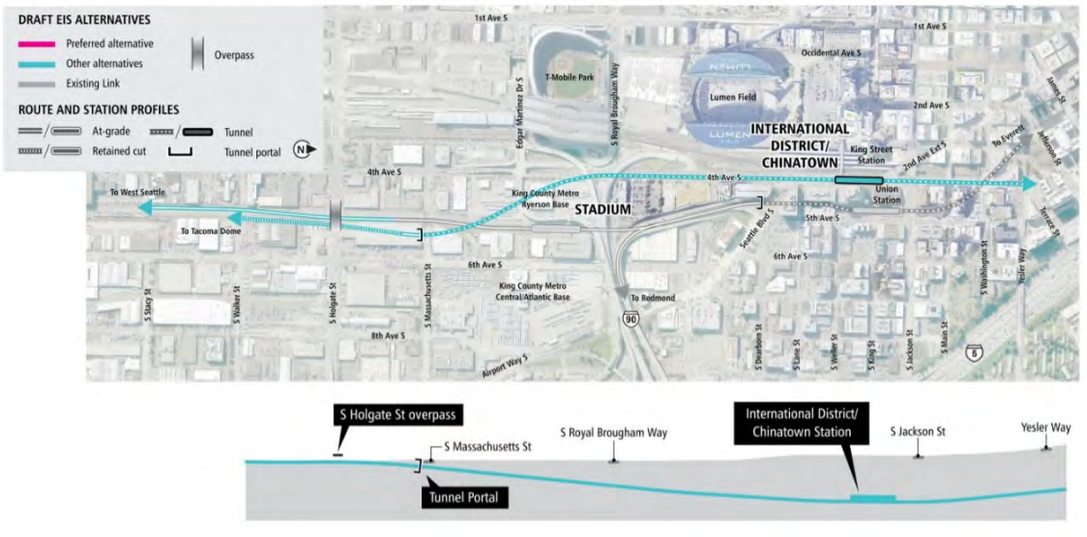
4th Avenue Deep

The 4th Avenue Deep Alternative would begin north of the SODO station and continue east of the existing Link light rail line and extend north. The alternative would then enter a tunnel heading northwest to continue north beneath 4th Avenue South with a deep tunnel and station.

Station location: The station would be located beneath 4th Avenue South, west of and with underground pedestrian connection to the existing International District/Chinatown Station.



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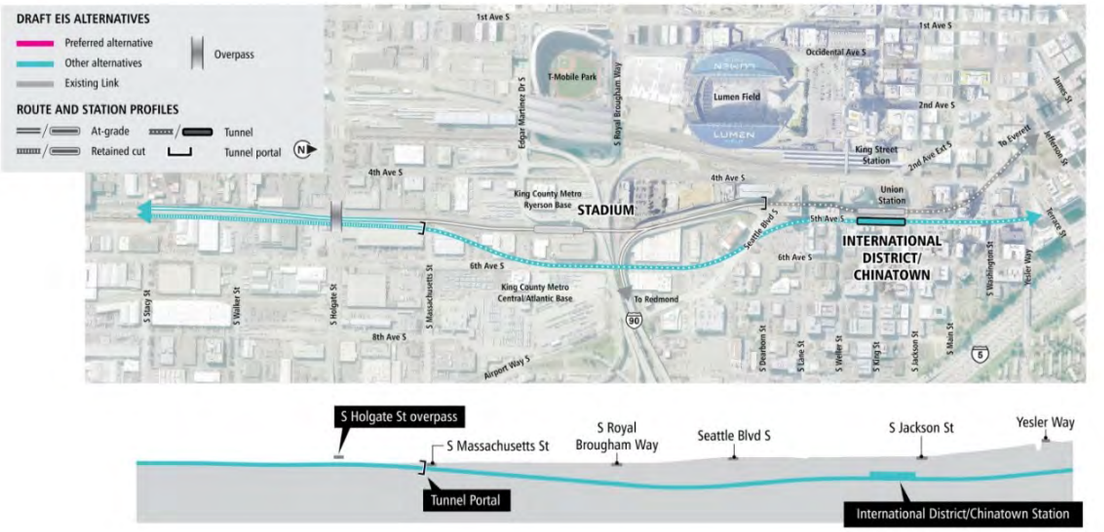
5th Avenue Shallow

The 5th Avenue Shallow Alternative would begin north of the SODO station and continue east of the existing Link light rail line and extend north. The alternative would then enter a tunnel heading north beneath 6th Avenue and then transition to under 5th Avenue South.

Station location: The station would be located beneath 5th Avenue South, east of and with underground pedestrian connection to the existing International District/Chinatown Station.



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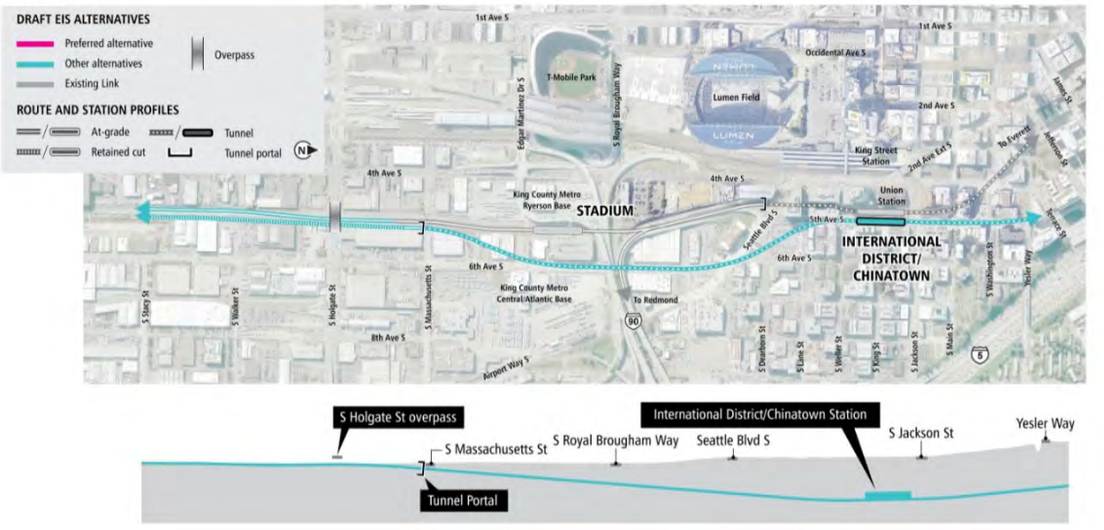
5th Avenue Deep

The 5th Avenue Deep Alternative would generally follow the same route as the 5th Avenue Shallow Alternative, except that the tunnel and the station would be deeper.

Station location: The station would be located beneath 5th Avenue South, east of and with underground pedestrian connection to the existing International District/Chinatown Station.



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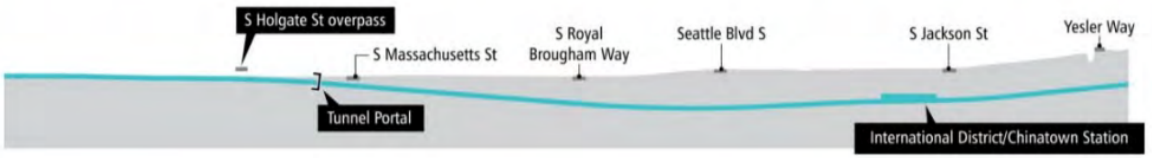
5th Avenue Shallow Diagonal

The 5th Avenue Shallow Diagonal Alternative would be the same as the 5th Avenue Shallow Alternative except that it would transition towards 5th Avenue South further north of Seattle Boulevard South.

Station location: The station would be located beneath the area between 5th Avenue South and 6th Avenue South, east of and with underground pedestrian connection to the existing International District/Chinatown Station.



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Downtown

Preferred Alternative: 5th Avenue/Harrison Street Refined (Connects to Preferred CID/SODO Alternative)

The 5th Avenue/Harrison Street Refined (Connects to Preferred CID/SODO Alternative) would be in a tunnel generally from south heading north between 4th Avenue and 5th Avenue and beneath Westlake Avenue then heading west under Harrison Street and Republican Street.

Station locations:

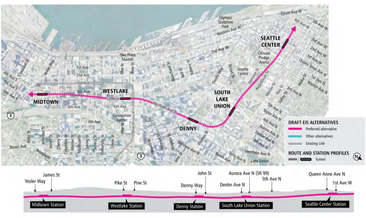
Midtown: The station would be located east of 4th Avenue between Terrace Street and James Street, east of and with underground pedestrian connection to the existing Pioneer Square Station.

Westlake: The station would be located beneath 5th Avenue between Pike Street and Pine Street with entrance consolidation and with underground pedestrian connection to the existing Westlake Station.

Denny: The station would be located beneath Westlake Avenue between 9th Avenue and John Street.

South Lake Union: The station would be located beneath Harrison Street, between Dexter Avenue North and west of 7th Avenue North.

Seattle Center: The station would be located beneath Republican Street between 1st Avenue North and 2nd Avenue West.



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Downtown – other alternatives

5th Avenue/Harrison Street

The 5th Avenue/Harrison Street Alternative would be in a tunnel generally from south heading north under 5th Avenue and Westlake Avenue and then heading west under Harrison Street and Republican Street.

Station locations:

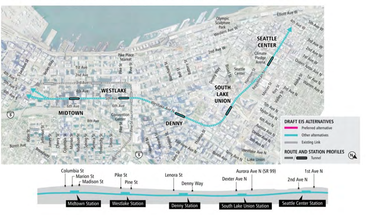
Midtown: The station would be located beneath 5th Avenue between Columbia Street and Madison Street.

Westlake: The station would be located beneath 5th Avenue between Pike Street and Pine Street and with underground pedestrian connection to the existing Westlake Station.

Denny: The station would be located beneath Westlake Avenue between Lenora Street and Denny Way.

South Lake Union: The station in South Lake Union would be located beneath Harrison Street, between Dexter Avenue North and just west of 7th Avenue North.

Seattle Center: The station in Seattle Center would be located beneath Republican Street, east of 1st Avenue North.



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6th Avenue/Mercer Street

The 6th Avenue/Mercer Street Alternative would be in a tunnel generally from south heading north under 6th Avenue and Terry Avenue, and then west under Mercer Street.

Station locations:

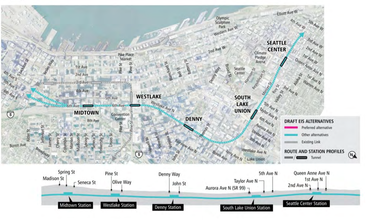
Midtown: The station in Midtown would be located beneath 6th Avenue, between Madison Street and Seneca Street.

Westlake: The station in Westlake would be located beneath 6th Avenue, between Pine Street and Olive Way and with underground pedestrian connection to the existing Westlake Station.

Denny: The station in Denny would be located beneath Terry Avenue North, between Denny Way and John Street.

South Lake Union: The station in South Lake Union would be located beneath north of Mercer Street between Aurora Avenue North and Taylor Avenue North.

Seattle Center: The station in Seattle Center would be located beneath Mercer Street, between Warren Avenue North and Queen Anne Avenue North.



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5th Avenue/Harrison Street Refined (Connects to Other CID/SODO Alternatives)

The 5th Avenue/Harrison Street Refined (Connects to Other CID/SODO Alternatives) would be in a tunnel generally from south heading north under 5th Avenue and Westlake Avenue and then heading west under Harrison Street and Republican Street.

Station locations:

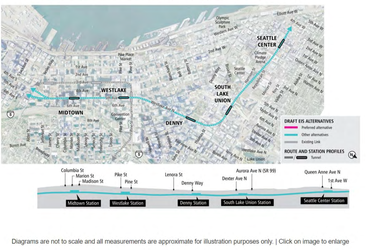
Midtown: The station in Midtown would be located beneath 5th Avenue between Columbia Street and Madison Street.

Westlake: The station would be beneath 5th Avenue between Pike Street and Pine Street and with underground pedestrian connection to the existing Westlake Station.

Denny: The station would be beneath Westlake Avenue between 9th Avenue and John Street.

South Lake Union: The station would be beneath Harrison Street, between Dexter Avenue North and west of 7th Avenue North.

Seattle Center: The station would be beneath Republican Street between 1st Avenue North and 2nd Avenue West.



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5th Avenue Consolidated Denny/South Lake Union Station Alternative

The 5th Avenue Consolidated Denny/South Lake Union Station Alternative would be in a tunnel generally heading north between 4th Avenue and 5th Avenue and beneath Westlake Avenue then heading west under Republican Street.

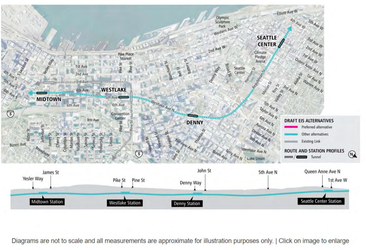
Station locations:

Midtown: The station would be east of 4th Avenue between Terrace Street and James Street, with underground pedestrian connection to the existing Pioneer Square Station.

Westlake: The station would be beneath 5th Avenue between Pike Street and Pine Street with entrance consolidation and with underground pedestrian connection to the existing Westlake Station.

Denny: The station would be west of Westlake Avenue between 9th Avenue and John Street.

Seattle Center: The station would be beneath Republican Street between 1st Avenue North and 2nd Avenue West.



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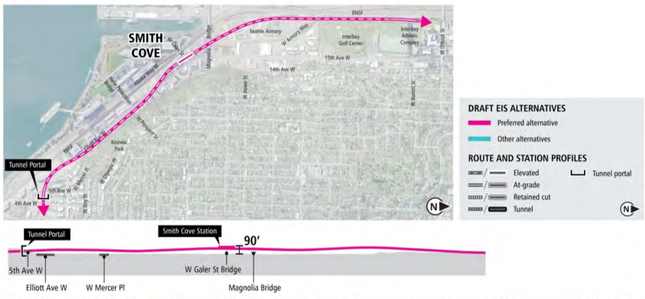
South Interbay

Preferred Alternative: Galer Street Station/Central Interbay

The Galer Street Station/Central Interbay Alternative would exit a tunnel portal at West Republican Street and Elliott Avenue West and transition to an elevated guideway. The guideway would continue northwest along Elliott Avenue West to an elevated Smith Cove Station at the West Galer Street Flyover. The elevated track would continue north over the Magnolia Bridge, through the Interbay Armory, and along the west side of the Interbay Athletic Complex.

Station location: The station at Smith Cove would be located above and straddling the West Galer Street Flyover.



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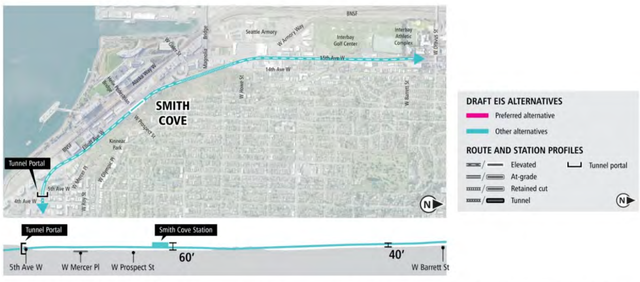
South Interbay - Other alternatives

Prospect Street Station/15th Avenue

The Prospect Street Station/15th Avenue Alternative would exit a tunnel portal at West Republican Street and Elliott Avenue West and transition to an elevated guideway. The guideway would continue northwest along Elliott Avenue West and enter the Smith Cove Station just north of West Prospect Street. From the Smith Cove Station, the elevated guideway would transition into a retained cut before again becoming an elevated guideway in the center of 15th Avenue West.

Station location: The elevated station at Smith Cove would be located north of Kinnear Park on the east side of Elliott Avenue West.



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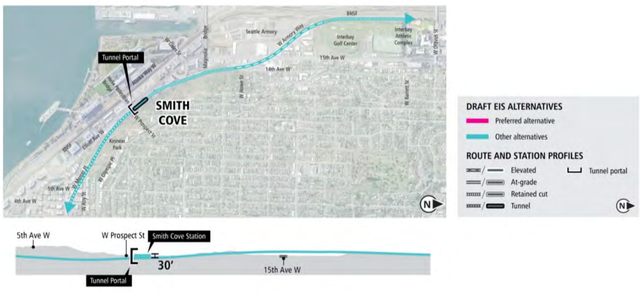
Prospect Street Station/Central Interbay

The Prospect Street/Central Interbay Alternative would continue as a tunnel from downtown to a tunnel portal on the east side of Elliott Avenue West near West Prospect Street. The alternative would continue north from the tunnel portal in a retained cut to the Smith Cove Station just north of West Prospect Street. From the station, the alternative would transition to an elevated guideway and continue north along West Armory Way and west of the Interbay Athletic Complex to connect to the Elevated 14th Avenue Alternative in the Interbay/Ballard segment.

Station location: The retained cut station in Smith Cove would be located north of West Prospect Street on the east side of Elliott Avenue West.



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Interbay / Ballard

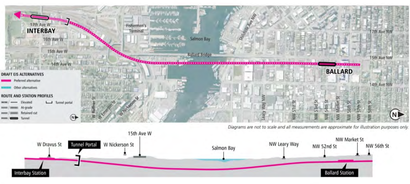
Preferred Alternative: Tunnel 15th Avenue

The alternative would begin at Interbay station straddling below West Dravus Street and continue in a retained cut to a tunnel portal traveling northeast under Salmon Bay (east of the Ballard Bridge), and then continue north in a tunnel east of 15th Avenue Northwest to the Ballard Station.

Station locations:

Interbay: The retained cut station at Interbay would be located through the Interbay Athletic Complex, below and straddling the existing West Dravus Street roadway bridge.

Ballard: The Ballard tunnel station would be east of 15th Avenue Northwest and south of Northwest Market Street.



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Interbay/Ballard - other alternatives

Tunnel 14th Avenue

The Tunnel 14th Avenue Alternative would enter a retained cut parallel to the BNSF tracks and then curve northeast to the Interbay Station. The alternative would continue in a retained cut from Interbay Station to a tunnel portal. The tunnel would travel northeast, under Salmon Bay (east of the Ballard Bridge), and then curve north beneath 14th Avenue Northwest to the Ballard Station.

Station locations:

Interbay: The retained cut Interbay station would be located north of West Dravus Street, between 17th Avenue West and Thorndyke Avenue West.

Ballard: The Ballard station would be located under 14th Avenue Northwest and Northwest Market Street.

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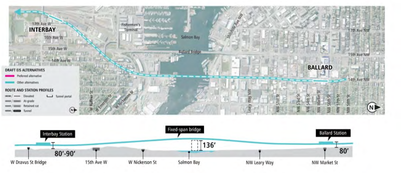
Elevated 14th Avenue

The Elevated 14th Avenue Alternative would travel parallel to the BNSF tracks over West Dravus Street and continue northeast to the Interbay Station. The alternative would continue elevated to a fixed-span bridge on the east side of the Ballard Bridge (15th Avenue Bridge). The alternative would continue north within 14th Avenue Northwest to the Ballard Station.

Station locations:

Interbay: The elevated Interbay Station would be located north of West Dravus Street between the railroad tracks and 17th Avenue West.

Ballard: The elevated Ballard station would be located on the east side of 14th Avenue Northwest, straddling Northwest Market Street.



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Elevated 14th Avenue (from Prospect Street Station/15th Avenue)

The Elevated 14th Avenue (From Prospect Street Station/15th Avenue) Alternative is a design option for connecting the Prospect Street Station/15th Avenue Alternative in the South Interbay segment to the Elevated 14th Avenue Alternative bridge over Salmon Bay. The alignment would start south of the Interbay Station on 15th Avenue West. From the Interbay Station, the alternative would connect to the 14th Avenue alignment bridge over Salmon Bay. The bridge over Salmon Bay, the elevated guideway to the north, and the Ballard Station would be the same as for the Elevated 14th Avenue Alternative.

Station locations:

Interbay: The elevated Interbay Station would be located north of West Dravus Street between the railroad tracks and 17th Avenue West.

Ballard: The elevated Ballard station would be located on the east side of 14th Avenue Northwest, straddling Northwest Market Street.

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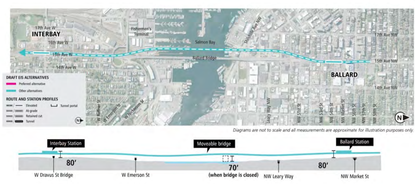
Elevated 15th Avenue

The Elevated 15th Avenue Alternative would be in the median of 15th Avenue West approaching the Interbay Station. From the station, the alternative would continue on an elevated guideway and cross Salmon Bay on a moveable bridge west of the Ballard Bridge. The alternative would continue north from the bridge on an elevated guideway to the Ballard Station.

Station locations:

Interbay: The elevated Interbay Station would be located above 15th Avenue West, straddling West Dravus Street.

Ballard: The elevated Ballard station would be located above the east edge of 15th Avenue Northwest, south of Northwest Market Street.



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2022 WSBLE Draft EIS

Sound Transit took public comments at an open house in February 2022 during the WSBLE Draft EIS comment period.

Sound Transit evaluated the WSBLE projects in a **Draft Environmental Impact Statement** (EIS), published on Jan. 28, 2022. After publication, a 90-day public comment period followed. The WSBLE Draft EIS was developed to help Sound Transit, partner agencies, and the public better understand the potential effects of the alternatives on the natural and built environment and transportation system and find potential mitigation measures.

Sound Transit Board's preferred alternatives

In July 2022, after reviewing the WSBLE Draft EIS and the comments from Tribes, the public and agency partners, the Sound Transit Board identified the **preferred alternative** for the WSLE and requested further study for the BLE. Read the July 2022 press release and Board Motion for more information.

After further studies from August 2022 to February 2023, the Sound Transit Board identified a preferred alternative for the Ballard Link Extension. Read the March 2023 Board Motion, the press release, and July Board Motion for more information.

Environmental review timelines

The extensions were initially on the same environmental review timeline. However, given additional environmental review needed for project refinements for BLE resulting from the Sound Transit Board action in March 2023, environmental review for the two extensions will now proceed on different timelines.

The WSLE proceeded to a Final EIS, expected to be published in 2024. A new BLE Draft EIS will be published in early 2025, reflecting actions by the Sound Transit Board in March and July 2023. The BLE alternatives will be updated, including an analysis of the preferred alternative and other refinements and alternatives identified in March 2023 and July 2023 Board Motions. The new BLE Draft EIS will build upon and incorporate the analysis in the WSBLE Draft EIS, including all previous scoping comments, public outreach and feedback, and environmental analysis.

Want to take another look at the WSBLE Draft EIS?

You can still explore the Draft EIS. The Executive Summary provides an overview of the Draft EIS. It condenses the larger Draft EIS to help readers quickly become acquainted with the project.

WSBLE Draft EIS Executive Summary

- English
- Spanish
- Simplified Chinese

- Traditional Chinese
- Vietnamese

You can view the entire WSBLE Draft EIS document online.

*After the WSBLE Draft EIS was published in January 2022, the Sound Transit Board identified different preferred alternatives than what are shown in the WSBLE Draft EIS. To learn more, visit the West Seattle Link Extension project page and the Ballard Link Extension project page.

Draft EIS Table of Contents -

Draft EIS Fact Sheet -

Cover, Letter, Signature page, Fact sheet, TOC

Chapter 1: Purpose and Need -

Chapter 1

States what problems the project will address and why the investment in this transit project is needed.

Chapter 2: Alternatives Considered -

Chapter 2

Describes the alternatives evaluated in the Draft EIS, including alignment and station locations, how they will be constructed, and how long construction will take.

Chapter 3: Transportation -

Chapter 3

Presents analysis of the existing transportation system in the project area and discusses potential impacts of the alternatives to regional facilities and travel and transit operations. Discusses ridership and travel times for each alternative as well as parking impacts in addition to pedestrian and bicyclist access at each station area.

- Transportation impacts for the West Seattle Extension
- Transportation impacts for the Ballard Extension

Chapter 4: Environmental Consequences -

Chapter 4

Discusses the affected environment and environmental consequences of the project.

- Environmental consequences for the West Seattle Extension
- Environmental consequences for the Ballard Extension

Chapter 5: Cumulative -

Chapter 5

Describes the project's effects on a particular resource, combined with past, present and future effects of other projects. The cumulative impact assessment can identify consequences that might not be apparent when the project is considered in isolation.

Chapter 6: Alternatives Evaluation -

Chapter 6

Evaluates how the West Seattle and Ballard Link Extensions alternatives meet the project's purpose and need. It also summarizes the benefits and impacts of each alternative.

Appendices A-H -

- A: List of Preparers
- B: Distribution List

- C: Acronyms & Abbreviations
- D: Glossary
- E: References
- F: Public Involvement and Agency Coordination
- G: Environmental Justice
- H: Draft Section 4(f) Evaluation

Appendix J: Draft EIS Drawings -

- Table of Contents
- Interbay/Ballard
- Downtown
- Chinatown-International District
- SODO
  - West Seattle Extension
  - Ballard Link Extension
- West Seattle

Appendices K-N: Technical Reports -

- K: Present and Future Development
- L: Supporting Information
  - L4.1 Acquisition
  - L4.2 - L4.11 land use, economics, social resources, air quality, water resources, geology, soil
  - L4.12 - L4.17 hazardous material, electromagnetic field, public service, safety, utilities, park, recreational resources
- M: Summary of Alternatives Development and Initial Assessment Process
- Appendix N1: Transportation Technical Report
  - N.1A Transportation Technical Analysis Methodology Report
  - N.1B Existing and Future Transit Routes and Levels of Service
  - N.1C Transit Service Integration Technical Memorandum
  - N.1D Existing and Future Intersection Levels of Service
  - N.1E Construction-Related Roadway Modifications
  - N.1F Pedestrian Levels of Service
  - N.1G Bicycle Master Plan Project List
  - N.1H Historical Collisions by Collision Type
- Appendix N2: Visual Technical Report
  - Att N.2A Key Observation Point Analysis
  - Att N.2B Station 3D Views and Cross Sections
- Appendix N3: Noise and Vibration Technical Report
- Appendix N3: Noise and Vibration Technical Report Attachments
  - N.3A Noise Measurement Data, Site Details, and Photographs
  - N.3B Vibration Measurement Site Photographs
  - N.3C Vibration Propagation Measurement Results
  - N.3D Maps of Noise Impact Assessment
  - N.3E Maps of Vibration Impact Assessment
  - N.3F Tables of Noise Predictions
  - N.3G Tables of Vibration Predictions
  - N.3H Vibration Analysis of Category 1 Uses and Special Buildings
- Appendix N4: Ecosystems Technical Report
- Appendix N4: Ecosystems Technical Report Attachments
  - N.4A Ecosystems Technical Analysis Methodology
  - N.4B Wetland Determination Data Forms
  - N.4C Ecology Wetland Rating Forms
  - N.4D Ecosystem Photographs
  - N.4E Wetland and Stream Impacts within the Study Area
  - N.4F Best Management Practices for Ecosystems Resources
- Appendix N5: Historic and Archaeological Resources Technical Report
- Appendix N5: Historic and Archaeological Resources Technical Report Attachments

- N.5A Table of Surveyed Properties
- N.5B Photographs of Historic Properties
- N.5C Built Environment Inventory Plan and Historic Context
- N.5F1 Agency and Tribal Consultation Letters
- N.5F2 Agency and Tribal Consultation Letters

*Appendix I is reserved for the mitigation plan and will be included in the Final EIS.

Equity and inclusion

Sound Transit is committed to centering communities along the project corridor and engaging communities of color and low-income and other vulnerable populations throughout the public involvement process. During the environmental review process, Sound Transit conducted an environmental justice analysis, which is included in the WSBLE Draft EIS. The analysis:

- Describes the demographics of the project corridor.
- Evaluates whether the projects would result in disproportionately high and adverse effects to communities of color and low-income communities.
- Considers potential project benefits such as improved access to opportunity.
- Documents our efforts to involve communities of color and low-income populations in the planning process and what we have heard so far from outreach efforts.

Along with the Draft EIS environmental justice analysis, Sound Transit and the City of Seattle have partnered on the Racial Equity Toolkit (RET) process for the projects. The RET lays out a process and a set of questions to guide the development, implementation and evaluation of the projects to advance racial equity. The RET process began early in project development, informing data analysis, technical evaluation and the focus and extent of community engagement. During the environmental review phase, the RET builds on the environmental justice assessment for the projects, documenting potential project impacts and benefits, and community feedback. However, given that the RET process is guided by a different framework than the EIS environmental justice requirements, the report on the RET process and findings is structured differently, and is oriented around **RET outcomes** for the projects. Our RET report on the process, requirements, outcomes, findings and community feedback is available for your reference.

Additional studies

Chinatown-International District (CID) Additional Study Results (2023 - 2024)

In March 2023, the Sound Transit Board adopted motion M2023-18 which identified a preferred alternative for the Ballard Link Extension project. As part of this motion, the Board directed staff to further study ways to minimize or eliminate construction impacts to the Chinatown-International District (CID) to significantly reduce the duration and effects of construction and maximize connections to all regional and local transit modes. Materials from these additional studies are included below.

Construction approach and duration

- System Expansion Committee 11/14/24 presentation
- CID Construction Click & Learn Activity
- Memo on construction approach and duration for CID Station alternatives [English] [Traditional Chinese] [Simplified Chinese] [Vietnamese]

Maximizing regional and local connections

- System Expansion Committee 11/14/24 presentation
- CID regional and local access connections video [English] [Cantonese] [Mandarin]

Additionally, the Board directed Sound Transit staff to work with the City of Seattle and King County and in partnership with the community to explore opportunities to advance improvement projects and public transit connections through the South Downtown Hub plan. Check out the South Downtown Hub Online Open House to learn more.

CID additional study materials are being provided for informational purposes and as resources for the Sound Transit Board and the public in advance of Ballard Link Extension Draft EIS publication in 2025, which will be followed by a public comment period and potential Board action to confirm or modify the preferred alternative.

South Lake Union Additional Studies (2023 – 2024)

In 2023 and 2024, the Sound Transit Board directed the project team to study additional station locations and alignment concepts in the South Lake Union area. Materials from these further study periods are included below.

SLU Feasibility Study (2024) **SLU Further Studies (mid-2023)**

BLE Further Studies (late 2022 – early 2023)

In July 2022, the Sound Transit Board directed the project team to complete additional further studies. Staff held community workshops, open houses, stakeholder meetings and surveys between September 2022 and January 2023.

For an overview of the further studies results, read the Further Studies Executive Summary and reports or the Further Studies Engagement Summary. Descriptions and key findings are included below by segment.

Chinatown-International District (CID) **Downtown** **Interbay/Ballard**

SLU Feasibility Study (2024)

In December 2023, the Sound Transit Board directed staff to assess the feasibility of a potential new alternative in the South Lake Union (SLU) and Denny area. This light rail alignment concept would locate the SLU Station roughly two blocks west of the current preferred alternative, near 5th Avenue North and Harrison Street, in tandem with a Denny Station Shifted West, outside of the Westlake Avenue right of way.

Between December 2023 and May 2024, Sound Transit engaged the public in various forums to share information and gather feedback about the SLU Feasibility Study and its findings. These engagement activities included an online survey, two live webinars, and over 40 stakeholder and community briefings.

At the May 23 Sound Transit Board of Directors meeting, Board members discussed and reviewed SLU Feasibility Study findings and community feedback about a potential new alternative in the SLU and Denny area. Board members also considered the staff opinion recommending that the Board take No Action, keep the current preferred alternative, and not carry forward the potential new alternative.

After discussion, the Board took No Action, keeping the existing alternatives and the current timeline for the BLE Draft Environmental Impact Statement, expected in early 2025. This meant that the BLE preferred alternative remained Denny Station Shifted North and an SLU Station at 7th Avenue North & Harrison Street.

In arriving at this outcome, Board members weighed community priorities, regional needs, input from stakeholders and agency partners, and community feedback. Thousands of community members engaged with us during the feasibility study process. Thank you for your input. You can access a summary of recent engagement activities related to this work and community feedback themes online.

For more information:

- Sound Transit Board SLU Feasibility Study Assessment and Public Engagement Report (5/24)
- Sound Transit Board Feasibility Study Results (4/24)
- Sound Transit Board Feasibility Study Report (12/23)
- Sound Transit Board Feasibility Study Report (11/23)

SLU Further Studies (mid-2023)

Starting in March 2023, following direction from the Board, staff convened technical work sessions and associated engagement activities to clarify the technical, financial, schedule and risk implications of the Denny route and station locations and share findings with the community. Technical work focused on a range of topics including utility relocations, constructability, construction schedule, roadway closures, and cost. New station and alignment concepts explored in these studies and engagement included:

- A Denny Station shifted north
- A Denny Station shifted west (consolidated station concept with the Harrison St Station)

Sound Transit hosted numerous community briefings and two public webinars to gather feedback from transit users and inform the July 27 Board status report and action.

For more information:

- Sound Transit Board Denny Station Status Report (7/23)
- Sound Transit Board Denny Station Status Report (5/23)

General questions? Contact us:

Sound Transit Community Outreach
Phone: 206-903-7223
Email: ballardlink@soundtransit.org
Web: soundtransit.org/ballardlink
Subscribe to email updates: soundtransit.org/subscribe

Need accessibility/assistance online or at an in-person event?

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Property Owners

To build the Ballard Link Extension project, Sound Transit will need to purchase and use private property. In some cases, this means moving people from their homes or businesses.

Sound Transit's property acquisition process treats affected property owners and tenants fairly, provides appropriate Just Compensation and relocation benefits and minimizes hardships with all parties involved. We realize the possibility of being relocated from your home or business may be difficult, and we are here to answer questions and provide support throughout the process.

Sound Transit has specific policies and procedures that describe how the agency will work with property owners and tenants throughout the acquisition process. We follow federal, state and local laws in our property acquisition process, specifically the Uniform Relocation Assistance and Real Property Acquisition Policies Act, and state law.

Property owners and tenants that were contacted as part of the WSBLE Draft EIS process, will be contacted again as part of the BLE Draft EIS process. The property acquisition milestones will apply to the BLE Draft EIS publication.

Need more info?

For more information about property acquisition and relocation, please refer to the following resources:

- Property Owners Folio
- Property Acquisition and Residential Relocation Handbook
- Property Acquisition and Business Relocation Handbook

Property acquisition milestones

Pre-Draft EIS publication

- Sound Transit **contacts potentially affected property owners**

Draft EIS publication

- Draft EIS available for public review and comments
- Sound Transit Board **confirms or modifies the preferred alternative** based on comments from the public, agency partners and Tribes

Final EIS publication

- Sound Transit Board **selects projects to be built**

Final Design

- Sound Transit **identifies property rights needed to construct, operate and maintain the system**
- Sound Transit Board **authorizes property purchases**
- Sound Transit will **prepare an appraisal to determine fair market value of property needed for the projects**
- Sound Transit will provide **relocation assistance** to people and businesses displaced by the projects, including referrals to comparable properties and payment of moving costs
- Sound Transit **staff are available to support property owners and tenants** through this process

Without concrete decisions until the release of Final EIS, we know this period of uncertainty can be stressful and are here to help. If you have additional questions or would like to set up a virtual meeting, contact our outreach team at ballardlink@soundtransit.org or 206-903-7223.

Frequently Asked Questions

When will I be notified if my property may be affected?

Potentially affected property owners are notified prior to the release of a Draft Environmental Impact Statement (EIS). Being a potentially affected property owner means that your property is close to one or more alternatives we are currently studying. This notification of potential impact does not mean a decision has been made to purchase your property.

What happens if Sound Transit identifies my property as potentially affected?

Notification that your property is potentially affected does not mean a decision has been made to purchase your property. But it does mean there's a possibility Sound Transit may need to acquire all or a portion of your property at a later project phase. As we refine project design, we'll continue updating our list of potentially affected properties. We won't make final determinations on which properties to purchase until after a Final EIS and the Sound Transit Board selects the projects to be built.

If I am required to move, what types of relocation assistance can I expect?

Residential relocation
For residential property owners and tenants, Sound Transit provides three primary types of relocation assistance: advisory assistance, moving expenses and replacement housing payments. A qualified relocation specialist will work with displaced residents to determine needs, explain benefits, and provide referrals to current housing inventories as well as assistance and advice with filing claims.

Business relocation
Sound Transit provides three primary types of relocation assistance: advisory assistance, moving expenses and business reestablishment expenses. The level of benefits and advisory services may be different for each displaced business depending on complexity of the business operation.

What does the acquisition process look like?

After the Sound Transit Board has selected the projects to be built and the Federal Transit Administration has issued a Record of Decision, the Board will authorize property purchases along the final project corridors. Several steps will take place before this authorization can occur, including:

- Preparing property information to inform the Sound Transit Board's authorization.
- Identifying the type of acquisition (i.e., full or partial acquisition, temporary or permanent easement).
- Officially notifying property owners that their property is being considered for acquisition by the Sound Transit Board and providing the date of the meeting at which the Board will consider authorizing acquisitions. Staff will notify property owners in advance of the Sound Transit Board meeting date where property acquisition will be discussed followed by an opportunity to provide public comments on the matter.

After authorization by the Sound Transit Board, Sound Transit will begin the property acquisition process, which follows these steps:

1. Appraisal is conducted by an independent appraiser to determine fair market value.
2. Appraisal is reviewed by a second appraiser for compliance with proper methodology and appropriate value conclusions.
3. Sound Transit prepares an offer package and delivers it to the property owner to review and negotiate. Property owners are also provided a copy of the appraisal.
4. Sound Transit negotiates to purchase the property.
5. Sound Transit may also reimburse for some or all of the following:
    a. Owner's own appraisal
    b. Legal review of offer
    c. Accounting review for tax purposes
6. For people and businesses displaced by the projects, a relocation agent will meet with the property owner to explain relocation assistance, eligibility and entitlements.

Other Frequently Asked Questions

Q: What is the average timeframe from the offer to closure of sale?
A: While each acquisition is unique, most processes can take anywhere between 12-18 months to complete.

Q: Does Sound Transit pay closing costs?
A: Sound Transit will pay for all normal sale expenses including escrow fees, title insurance, pre-payment penalties, mortgage release fee, recording fees and all typical costs related to conveying title. The sale will be exempt from real estate excise tax.

Q: If my house does have to be acquired and I have to relocate, am I able to stay in the same school district or buy a similar home?
A: Sound Transit will make every effort to find comparable properties within the desired market.

Q: Is there a geographical boundary limit for relocation?
A: No, there is no geographical limit on where you can move. Sound Transit will pay moving expenses within a 50-mile range.

Q: If there is a long delay between acquisition and when construction starts, will there be empty houses in neighborhoods for several years?
A: While acquisitions are tied to the project schedule, it is possible that homes could be vacated prior to construction starting. If that occurs, Sound Transit will take appropriate measures to secure the properties until demolition can take place.

The alternatives reviewed within the WSBLE Draft EIS included both underground and elevated tracks like the one above.

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